

## Details of Representations Received to the Proposed Submission Local Plan (Reg19) February 2025

**Evidence Base including:** Bushfield Planning Application documents, Development Strategy and Site Selection, Employment Land Study, Housing Topic Paper, Infrastructure Delivery Plan, Neighbouring Local Plans, Policies Map, Renewable Energy Study for Winchester District Development Framework, Setting of Winchester Report, Settlement Gap Review, Settlement Hierarchy, Statement of Community Involvement, Strategic Floor Risk Assessment, Strategic Housing and Economic Land Availability Assessment (SHELAA), Strategic Housing Market Assessment, Strategic Transport Assessment, Viability Assessment, Village Design Guidelines and Neighbourhood Plans, WinACC Renewable Energy in Winchester District and Windfall Assessment.

This document has been prepared to provide details of the representations received to the Proposed Submission Plan and the Council's response. It draws upon information contained within the submitted documents SD07b [Regulation 22 Statement of Consultation Part 2 \(November 2024\)](#) and SD16 [Regulation 20 representations \(November 2024\)](#). It is not considered that this document contains information which is substantially different to that set out within those submitted documents, but it has been prepared to assist in navigating and considering the representations received and Council Response.

For each plan policy or associated document, it sets out some key information from the regulation 22 statement regarding the number of representations received, representation numbers, an overall summary of responses made, and a list of the main issues raised by the representations. It then contains all of the representations recorded against that Plan policy or document, along with links to supporting documents. Finally, it sets out the Council's response to the representations made for that Plan policy or document, and any changes the Council now recommends are made to the Plan policy or document, alongside any other relevant information.

<b>Policy/Evidence base document</b>	Bushfield Planning Application documents
<b>Name of respondent (or client)</b>	Jamie Matthews .. Clerk
<b>Personal reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council
<b>Full reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council/7/Bushfield Planning Application documents
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Report of Knight Frank as appendix to Planning Statement of Litchfields submitted in support of the Bushfield Planning application This is the only document which considers the viability of the proposals from a commercial point of view. TPC rely on it in their objection to Bushfield W5
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/8/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24). Within the updated Development Strategy and Site Selection document (July 2024) it is stated in para 3.1 that the “starting point for considering the minimum level of housing development is the Government’s “Standard Method”. The expectation is that this will be followed unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”. Within the Reg 19 Local Plan the Council has updated the figures to take account of the latest published SM (as of March 2024) but has disregarded the proposed changes to the SM and significant additional annual requirement to be met by the district, given the “advanced stage of work that the new Local Plan has reached, and the significant delay and cost if matters are not expedited at this juncture”. Whilst the statement set out in para 2.10 above is made in relation to justifying why the Council did not propose a bespoke methodology to define its housing requirement, the significant increase in the housing requirement that the emerging SM suggests is considered to more than justify progressing an alternative approach which would appropriately address affordability concerns and the Government’s growth agenda by increasing the housing requirement to reflect the proposed updates to national policy.</p> <p>The Council’s approach to rush through the Local Plan based on the current SM, raises serious questions in terms of the robustness of the Plan, its evidence base and how the Plan has reacted to responses raised in the consultation process, significant issues which will no doubt become apparent through the examination process if progressed. As the Council acknowledges this would result in the need to start a review of the Local Plan as soon as it is adopted, meaning the settlement boundaries could be considered out-of-date (particularly based on the significant shortfall) at the point of adoption. Within the 2024 Housing Topic Paper the Council confirm in para 3.6 that “following the July 2024 General Election, the Government has announced its intention to reintroduce housing targets. It is expected that this will be done by reversing some of the changes made to the NPPF in December 2023. This is likely to reinforce the conclusion that the Standard Method should be used and, indeed, it may become obligatory”. The Council clearly understands the implications of the proposed updates to the NPPF/ SM but are essentially disregarding the changes in order to fast track the Plan under the existing housing need figure. On this basis alone this is clearly not a</p>

version of the Local Plan which has been positively prepared or justified by the evidence available at the point of submission. According to the Development Strategy and Site Selection Reports, discussions were held with Town and Parish Councils across the district regarding the emerging development strategy and potential SHELAA sites to meet the level of development identified. Whilst we understand initial discussions were held with Parish Councils including Otterbourne, as was raised in response to the Reg 18 consultation, it is felt that they should have been more appropriately supported, particularly in terms of the site assessment process and the final decision over which site to allocate. Page 76 to 79 of the 2024 Development Strategy includes the justification for putting Land east of Main Road forward for allocation, which is based on the response from Otterbourne Parish Council. This remains the same response as put forward in the 2022 Development Strategy, despite the queries raised in this regard through the Reg 18 consultation.

In putting forward Land off Main Road, it is clear in its response that the Parish Council were still open to other options for development in the village at that point. The report highlights that the Parish Council had had three meetings with landowners of those SHELAA sites in Otterbourne and a fourth was arranged. This is within the same response as the allocation put forward; and suggests the appropriate assessment of the alternative sites had yet to be made before the decision was issued. It is our concern that the allocation put forward was rushed through in order to meet the Winchester Council's deadline, rather than with confidence that this was the most appropriate choice for the village – with the Parish response specifically stating (our emphasis): “We are also in discussions with Barwood Land, representing the landowner of OT08 Land west of Cranbourne Drive (see letter attached). Both of these sites could offer Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne pg. 31 potential for part-site consideration, and we are not closed to these options, particularly in relation to the requirement for securing the s106 agreement for development of the OT03 part-site. Both options are sustainable in terms of proximity to village amenities, the major concerns being vehicular access and traffic generation in an area of the village with residential density and walking routes to the primary school, but they too could offer potential community open space benefit if that should be the way forward. To conclude, with the information in hand and in principle agreements, the above is the best way forward we have currently agreed at the Parish Council meeting 17 May for future development of our village. Our next Parish Council meeting is 19 July, and we would appreciate further consultation with WCC in regard to the above prior to this meeting”. We are aware through meeting with the Parish Council, that no further consultation took place, which again suggests that site OT03 was progressed without an appropriate consideration of the alternatives.

As shared through the Reg 18 consultation response, figure 8 below sets out extracts taken from Annex A of Otterbourne Parish Council's meeting minutes of 8 March 2022 and includes reference to both OT03 Land east of Main Road and OT08 Land off Cranbourne Drive. In reviewing this table, as we have previously highlighted, it becomes unclear how or at what point it was decided to progress with site OT03 (Land off Main

Road) as the proposed allocation, given this was not the favoured option as shown in the scores of both the village residents and indeed the Parish Council. The minutes including annex A and B have also again been submitted alongside these representations (appendix 3). In reviewing those scores, it should be noted that these include all 8 sites within Otterbourne which were originally put forward in the SHELAA, some of which were later discounted as whilst they were favoured by residents (given their distance from the centre of the village and therefore considered impact), they were agreed to be unsustainable locations, given their distance from the settlement boundary. As can be seen from the table, Land off Cranbourne Drive (OT08) was scored 5th by residents of the village and 2nd by the Parish Council. Land east of Main Road (OT03) was scored 7th by residents and 5th by the Parish Council, again highlighting of the two sites, Land of Cranbourne Drive should have been progressed as the preferred option. In reviewing the table set out in Figure 8, the following points stand out:

- The statements that OT08 is considered to have a high number of constraints and Land east of Main Road a low number. It is unclear what these constraints are, as our own Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne pg. 32 review (particularly considering highways, heritage and landscape impact), would suggest OT03 is significantly more constrained).
- Responses to both sites mention potential traffic impact on Main Road, but this was not mentioned as a perceived issue from residents when progressing with OT03.
- It is unclear where the assumption with regard to the delivery of flats emerged at OT08; and how this site would be any different in terms of what mix was progressed. Indeed, given the suggested density achievable at OT03 (as part of the OT01 allocation) it is more likely that OT03 would see the delivery of more flatted units.
- Again, looking at the potential benefit of OT03, it records the potential delivery of a mixture of housing types and affordable/ market value homes. Again, it is unclear how this site is considered different. OT08 will also deliver a range of housing types and tenures and would have the ability to deliver increased levels of affordable housing. Indeed, the other benefits listed under OT03 in relation to the potential amenity area and the ability to deliver all the housing on one site should have also been listed under the benefits of OT08. Figure 9. Annex A Planning Minutes 08/03/2022.

The following extract (Figure 10) is also taken from Annex B of the Parish Council Planning Minutes of 8 March 2022 and confirms that of the 145 responses received (23% response rate) only 23 respondents were “For” site OT03 Land east of Main Road, and a significant 112 Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne pg. 33 respondents were against; suggesting 77% of those responding were against the allocation of site OT03. In comparison 53 respondents were “For” site OT08 Land off Cranbourne Drive and 79 against, indicating OT08 would be the more preferred option, with just over a third of those responding “For” the site. The results of the parish survey do not appear to reflect what has been put forward as most preferred by the residents or indeed at that point the Parish Council. In light of these results and no

further evidence to suggest any showstoppers or significant constraints on OT08, and the fact this site is being promoted with Chamberlayne Estates, a landowner that has prioritised quality and legacy; it should have been recommended as a preferred option. Figure 10. Annex B Planning Minutes 08/03/2022. The change in approach in terms of the site progressed for allocation, may have been based on considering this as a 'part site', and the supposed gifting of land to the Parish Council; however, if this is the case, the same consideration should have been given to Land off Cranbourne Drive in terms of what that site could also offer. As to be discussed in section 4, Land off Cranbourne Drive has the ability to deliver 6.9 hectares of open space and to gift 5.26 hectares of woodland to the Parish Council. Significantly above and beyond the 2.8 hectares proposed to be offered to the Parish Council at Land east of Main Road. The site also now offers land for the delivery of either a community building or health facility. Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne pg. 34

Not allocating OT03 Land east of Main Road would mean the area of open space around the public right of way could be retained as such and continued to be enjoyed by residents of Otterbourne. Land off Cranbourne Drive is not currently publicly accessible and therefore any increase in publicly accessible open space in this location could be of significant benefit to the local community. As highlighted to the Policy Team (see appendix 4) between the 9th May and 10th June 2024 Barwood Land also undertook a community consultation - <https://www.landoffcranbournedrive.uk/> in order to further understand local views in relation to the allocation being progressed and whether an alternative site such as Land off Cranbourne Drive would indeed be preferred. As part of the consultation, letters were sent to 684 homes and businesses in the parish of Otterbourne, as well as to the Parish Council.

The consultation ran for just over 4 weeks and over that period the website was visited 1,412 times. In total we had 41 responses to the consultation and as opposed to seeing any consistent support for the draft local plan allocation, of those who responded 51% confirmed they had concerns regarding the proposed allocation at Land off Main Road, with just 22% appearing to support the allocation and the remainder either neutral or focussing their response specifically on Cranbourne Drive. The main concerns and comments raised to the draft allocation were:

- Area is publicly accessible land regularly used by hikers / dog walkers / runners. The site was vital during Covid.
- Area seems very small to accommodate so much housing / cramped / concern regarding density.
- The proposal has been rejected twice already. The reasons for refusal still stand.
- Land east of Main Road was "the least preferred" of all options in the village survey.
- The development offers minimal benefit to the village and only provides housing and no additional amenities.
- The site is next to a walkable area of local nature and beauty.

	<ul style="list-style-type: none"> <li><input type="checkbox"/> Concern that housing development will extend beyond what is currently stated in the Local Plan.</li> <li><input type="checkbox"/> Concern over another direct access onto Main Road.</li> <li><input type="checkbox"/> General concerns raised regarding impact on services, school capacity, drainage capacity and increased levels of traffic and congestion in the village which will be true for any new development of this scale.</li> </ul> <p>In contrast 44% of those responding to the consultation supported development proposals at Land off Cranbourne Drive, with just 29% objecting and 27% leaving a neutral response and / or voicing concerns with the allocation of any development in Otterbourne. As is well Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne pg. 35 understood, it is often those who oppose development that are more likely to respond to a consultation such as this, so it is very positive to see this level of support. Whilst this information was shared with both the Parish Council and Winchester City Council Policy Team (see appendix 4), we were simply directed to responding to the upcoming Reg 19 consultation. As this information was not considered prior to progressing the Reg 19 Local Plan, and current allocation for Otterbourne, we hope the evidence is considered appropriately at this stage. We also acknowledge that given the significant additional need for housing as set out in the updated SM; and the fact sustainable locations such as Otterbourne look to be able to accommodate additional growth over that currently proposed, this site would be more suitable to meet the current need and/ or need as an additional site if required. Of particular relevance as it is considered that the capacity for Land off Main Road is inaccurate when considering the existing constraints.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	Yes <a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a> <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a> <a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 3 \(Preliminary Flood Risk and Drainage Review\)](#)

[Supporting document 4 \(Heritage Appraisal\)](#)

[Supporting document 5 \(Map - Compliant Site Access\)](#)

[Supporting document 6 \(Local Plan Site Promotion - Transport\)](#)



<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/13/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Development Strategy and Site Selection (DSSS) July 2024 Paragraph 6.2 of the DSSS confirms that Winchester is the highest rated settlement in the settlement hierarchy review given it contains a large number of facilities and services, including 'higher order' facilities. Paragraph 6.4 includes a summary table of all those sites assessed within the IIRA within or on the edge of the built up area of Winchester. This includes LH09, LH10 and LH14. The table confirms that these sites score consistently well relative to many other sites identified in Winchester, particularly HW09 (Policy W4 allocation), as highlighted above. Of note is that this table identifies Parcel LH09 as scoring a minor negative against IIRA objective 9, which is inconsistent with the IIRA which scored this as a significant negative. Appendix 3 of the DSSS assesses all the proposed Reg 19 allocations. This confirms at page 23 that the Policy W4 allocation had a landscape sensitivity score of 12, equating to a high landscape sensitivity where 'protection from development is the preferred option'.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
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<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TT-6
<b>Full reference number</b>	ANON-AQTS-32TT-6/6/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Please see our comments in respect of the Integrated Impact Assessment (IIA) as these overlap and relate to both the IIA and the Development Strategy and Site Selection: The Development Strategy and Site Selection (DSSS) 2024 paper assesses sites against 11 out of 14 objectives contained within the Integrated Impact Assessment (IIA). My client controls land at Springvale Road, Kings Worthy (site ref KW05) and so it is appropriate to consider that site in comparison to the two draft allocations in Kings Worthy (ref. KW02 and KW12 within IIA). We are pleased to note that the updated DSSS improves the scoring for KW05 against three of the objectives, namely 1 (climate change mitigation), 2 (travel and air quality) and 7 (services and facilities), which have all changed from ‘minor negative’ to ‘minor positive’. This means that KW05 scores higher than KW02 across four objectives – namely 1, 2, 4 (health and well-being) and 7. KW05 scores the same as KW02 across the remainder of the objectives. Therefore, overall, my client’s site performs better than draft allocation KW02. Similarly, KW05 scores higher than the other draft allocation (KW12) against objectives 1, 2 and 7, the same against objectives 4, 8 (economy), 9 (biodiversity and geodiversity), 11 (historic environment) and 14 (flood risk). The scoring for objective 10 (landscape) was negligible uncertain for KW12 where it ‘was not possible to come to a judgement’ so this cannot be compared to the scoring for KW05. KW05 scores less than KW12 against objectives 12 (natural resources) and 13 (water quality), although we dispute the scoring as set out below. However, overall, it is clear that my client’s site at KW05 scores more highly than the proposed allocation at KW12.</p> <p>Notwithstanding the above, we maintain that the scoring for KW05 against some of the objectives should be improved. In respect of objective 4 (health and wellbeing) this element of the assessment fails to take into account that my client is able to offer land north of the field identified within the evidence base as public open space which has associated benefits as outlined in a letter submitted to the Council in September 2022 and enclosed with these representations. In terms of Objective 10 (landscape) it is considered inappropriate to consider the effects of KW05 would be wholly negative in the context of the potential for the northern field to be converted to public open space. That land is currently private land however, the allocation of the site could bring the land into public use with the associated benefits of opening the landscaping to local residents. The land rises away to the west, meaning that views across a wider vista would also be possible from the</p>

land. As such, it is considered more reasonable to score KW05 a +/- (mixed minor effects likely) in respect of objective 10. At present, formal playing pitches are provided at Eversley Park Recreation Ground on the eastern side of Kings Worthy, south of Lovedon Lane, and informal public open space is also located on the eastern side of the village south of Lovedon Lane, adjacent to the A33. The provision of informal public open space on the western side of the village through the allocation of site KW05 will deliver an important new community facility which is accessible on foot to existing and future residents. Against objective 12 (efficient use of land) KW05 was assessed as having a 'significant negative effect' whereas KW12 is scored as having a minor negative effect. The rationale behind this scoring is questionable given the presence of the buildings on the two other proposed allocations (raising a question over why they weren't scored equivalently to each other) but also because KW05 is a greenfield site and could offer a viable option to provide a significant quantum housing, making the efficient use of land on a very sustainable site. The scoring against objective 13 (water resource), is also questionable given – KW02 and KW05 scored equivalent to each other with an alleged 'significant negative effect' whereas KW12 was scored as having only a 'minor negative effect'. The assessment is based on drinking water quality. The rationale behind the differentiation between the sites in terms of water quality is unclear however, KW05 has full access to clean drinking water and in this regard it is no different to existing or other future residential development in Kings Worthy. Drawing this together, KW05 has scored more highly overall than both the proposed allocations. As such, there is no reason why it should not be brought forward to meet identified need for open market and affordable housing within Kings Worthy.

In terms of other merits, the site is located within an enclave. The residential neighbourhood of Springvale lies immediately to the north of the site. Furthermore, residential neighbourhoods lie immediately to the east. The site is adjacent to and fronts onto Springvale Road which provides good connections to the commercial centre of Kings Worthy, including the school to the east. Whilst there are no footpaths on the site itself, there are a number in the immediate vicinity. There is good pedestrian and vehicular permeability with the settlement and as such, its location is inherently sustainable. The majority of the site lies within Flood Zone 1 being at low risk from flooding. As such, the development of the site for residential purposes is acceptable and accords with the provisions of the NPPF. A Preliminary Ecology Assessment has been carried out which has not identified any International or National sites of Ecological importance on the site. As part of the early-stage concept proposals, those areas with most ecological value or potential have been excluded from the development parcel including the incorporation of appropriate buffers to offset development from those areas. The site is framed by mature tree cover on the northern, western and southern boundaries associated with transport corridors, whilst residential neighbourhoods frame the site to the east. As a consequence, there is a strong sense of visual containment associated with the site.

In addition, as set out in our letter to WCC in September 2022 (enclosed), my clients site also represents the opportunity for the Council to address an identified open space deficit in Kings Worthy. The WCC Open Spaces Assessment (July 2022) indicates that there is a deficiency in Play space along with Park /

	<p>Recreation Ground in Kings Worthy. There is also a notable imbalance between the east and west sides of Kings Worthy whereby all existing Play space and Parks / Recreation Grounds are located on the east side of the settlement at Eversley Park. Existing residents on the west side of Kings Worthy have a walk of over 1km, partly uphill to access their nearest public open space. The masterplan enclosed with these representations shows how my client's site at Springvale Road could address both the deficit and imbalance within the settlement through the provision of a new area of open space on the northernmost field at the Springvale Road site. Given the historic importance of that land, it is to remain undeveloped to allow the below ground archaeology to be preserved. There is also an opportunity to enhance local awareness and understanding of the heritage asset using interpretation boards and information panels on the land. Furthermore, it is possible that the ecological value of this land could be enhanced through managed wildflower planting on part of the space. The field could become a new local open space for new and existing residents to enjoy with both historic and ecological value and interest. Taking all of the above into account, it can be demonstrated that site KW05 is a high quality site, in a sustainable location capable of providing much needed housing and open space in a settlement well positioned to accommodate housing numbers to contribute towards provision in Winchester as a key settlement but also within the District as a whole.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Supporting information (Illustrative concept masterplan)</a>  <a href="#">Supporting information (Copy of letter re: Land at Springvale Road, Kings Worthy)</a></p>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TA-K
<b>Full reference number</b>	ANON-AQTS-32TA-K/6/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Please see our comments in respect of the Integrated Impact Assessment (IIA) as these overlap and relate to both the IIA and the Development Strategy and Site Selection.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
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<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3BPV-M
<b>Full reference number</b>	ANON-AQTS-3BPV-M/6/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Please see our comments in respect of the Integrated Impact Assessment (IIA) as these overlap and relate to both the IIA and the Development Strategy and Site Selection. Integrated Impact Assessment 2024</p> <p>The Development Strategy and Site Selection 2024 paper does not identify any new allocations at Waltham Chase, which is reflected in the Draft Plan whereby the current, adopted Local Plan allocation at Morgan’s Yard is carried forward (WC1). This is on the basis that ““However, given the constraints around the village, particularly the narrow settlement gap with Swanmore, and the substantial level of allocated land remaining to be developed, no new sites are allocated in this Plan.” As set out elsewhere in these representations, it is considered that the spatial distribution of housing across the District is imbalanced. Accordingly, it is considered appropriate to consider which of the available sites should be considered to address this deficiency.</p> <p>Bargate Homes’ site at Land South of Lower Chase Road, Waltham Chase (SH11) scored equivalent to WC1 in its overall score against the 11 objectives within the DSSS/IIA and on that basis there is no reason that it should not be allocated to rebalance the housing need across the District. Indeed, upon further scrutiny of the site assessment for SH11, it is clear that it’s scoring should be increased, such that it performs more favourably than WC1, as set out below. We note that the site assessment for SH11 within the IIA report (Appendix F, pg’s 803-805) scores SH11 as 'minor negative' against IIA objectives 1 (climate change), 2 (travel and air quality) and 7 (access to services/facilities/jobs) and that part of the justification is that the site is “not within 2,000m of a secondary school”. The site lies to the east of Waltham Chase and is within 500m of Swanmore College. This was raised in our representations on the Regulation 18 Plan. However, the 2024 IIA still states that the site is not within 2,000m of a secondary school. This is factually incorrect and should be amended. This element of the site assessment should also be revised to score ‘major positive’, in recognition of the site's close proximity to this important local facility. Furthermore, the IIA objectives 1d and 1e only assess distances to town, district and local centres. This approach ignores proximity to the centre of Waltham Chase which, as we have set out in our response to the Settlement Hierarchy Review, should be reinstated as a 'larger village' given the range of services and facilities it has to offer. Indeed, paragraph D.53 of the IIA Report Appendices recognises the important role Waltham Chase has to play, stating “Beyond the</p>



Winchester Town the eight larger settlements of the District (Bishop Waltham, Colden Common, Denmead, Kings Worthy, New Alresford, Swanmore, Waltham Chase and Wickham) provide a focal point for their own communities. They also provide some services for nearby smaller villages.” The IIA site assessment scoring should be revised to take into account the distance of potential site allocations to larger village centres. In the case of SH11, this site is the closest site to Waltham Chase centre of those identified in the SHELAA, lying approximately 130m from the crossroads at the centre of the village where the convenience store/post office and hairdressers (which has replaced the bike shop) are located. As set out in the Transport Advice Note submitted in support of these representations, pedestrian and vehicular access can be provided through Bargate’s Hawthorn Grove development to the south, linking to the bus stops on Forest Road (which provide services to destinations including Bishops Waltham, Botley, Hedge End, Wickham, Winchester, Fareham, Eastleigh (including Barton Peveril College) and Havant (including Havant and South Downs College)) and services in the village. Taking all of the account all of the above, the scoring for SH11 against IIA objectives 1, 2 and 7 should be revised so that it scores at least ‘minor positive’ to reflect its location close to both the centre of Waltham Chase and Swanmore College.

The IIA explains that, in scoring sites against IIA objective 8 (supporting the sustainable growth of the district’s economy) effects for all residential sites are uncertain, given that they are based on information provided by site promoters on the call for sites forms as these forms have not always been completed by site promoters to the same level of detail. However, where sites are clearly greenfield (such as SH11) surely the uncertainty can be removed. SH11 should be scored at least ‘negligible’ rather than ‘negligible uncertain’. We question the approach taken to assessing sites against IIA10 (landscape), which lacks transparency. For example, SH11 is a 4ha site adjoining the settlement policy boundary of Waltham Chase and bounded by existing residential development to the south and west, with hedgerows and trees on its eastern and northern boundaries. It is assessed as ‘minor negative uncertain’. SH14 (Raglington Farm, Botley Road, Shedfield) is a 153ha site, remote from any defined settlements on exposed rising land. However, it is assessed as performing better than SH11 in landscape terms, scoring ‘negligible uncertain’. The scoring for SH11 should be revised to be ‘negligible uncertain’ or better. On the basis of the assessment above, and as summarised in Table 1 below, SH11 can be considered to score well in respect of objectives IIA1 (climate change), IIA2 (reducing the need to travel), IIA4 (health and welling being), and IIA7 (access to services). The site is well located closer to the centre of the village than any other site in the SHELAA and within walking distance of both Swanmore College and St John the Baptist Primary School, meaning it could support the sustainable growth of the economy (IIA8), and has limited ecological value and is visually well contained (IIA9 and IIA10). It has no heritage constraints (IIA11), would be an efficient use of available land close to existing services (IIA12) and has no negative impact on water resources or flood risk (IIA13 and IIA14).

Table 1: Comparison of IIA and Pegasus Group Site Assessment Scoring for SH11 IIA Objective IIA Scoring Pegasus Group Scoring IIA1: climate change mitigation Minor negative (-) Minor positive (+)

	<p>IIA2: travel and air quality Minor negative (-) Minor positive (+) IIA4: health and wellbeing Minor positive (+) Minor positive (+) IIA7: services and facilities Minor negative (-) Minor positive (+)</p> <p>IIA8: economy Negligible uncertain (0?) Negligible (0)</p> <p>IIA9: biodiversity and geodiversity Significant negative (--) Significant negative (--)</p> <p>IIA10: landscape Minor negative uncertain (-?) Negligible uncertain (0?)</p> <p>IIA11: historic environment Negligible uncertain (0?) Negligible uncertain (0?)</p> <p>IIA12: natural resources Significant negative (--) Significant negative (--)</p> <p>IIA13: water resources Negligible (0) Negligible (0)</p> <p>IIA14: flood risk Negligible (0) Negligible (0)</p> <p>As such, SH11 is extremely well positioned to provide the additional housing needed within Waltham Chase. Indeed, when Pegasus Group presented our Vision Document for SH11 to Shedfield Parish Council in 2022, they commented that, should there be a need for allocations in Waltham Chase, they would not object to SH11 being selected.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Letter (comment on Policies and Evidence Base - includes tables)</a>  <a href="#">Supporting document 1 (Transport advice - Land north of Meon Green, Forest Road, Waltham Chase)</a>  <a href="#">Supporting document 2 (Vision Document - Land South of Lower Chase Road, Waltham Chase)</a></p>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Laura Cornborough
<b>Personal reference number</b>	ANON-AQTS-32TQ-3
<b>Full reference number</b>	ANON-AQTS-32TQ-3/4/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>FHL strongly believe that the site west of Otterbourne Road should be included as an allocation within this Plan Period alongside the existing draft allocation OTO1.</p> <p>The location of the site, adjoining Otterbourne's settlement boundary but being within the parish of Shawford means the site has the potential to deliver homes for both of these settlements but ensuring a carefully designed scheme would not cause any detrimental harm to the integrity of the gap between the two settlements.</p> <p>A carefully detailed scheme would be crafted by ensuring any built development would not go north of Sparrowgrove with the north of the site being used for public open space provisions with additional tree planting to continue the 'green buffer' between Otterbourne and South Down. Additionally, our scheme would be carefully aligned with the proposed water transfer route via Southern Water which traverses the south of the site.</p> <p>Securing this site as an allocation will ensure Otterbourne will meet any immediate housing requirement along with that of the rest of the Plan period.</p> <p>The site west of Otterbourne Road should become an additional allocation for the settlement of Otterbourne.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting information (comments on policies)</a>

<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Laura Cornborough
<b>Personal reference number</b>	ANON-AQTS-32TM-Y
<b>Full reference number</b>	ANON-AQTS-32TM-Y/3/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>FHL strongly believe that the site north of Solomons Lane should be included as an allocation for the forthcoming plan period. The location of the site means that future residents would be well connected to the rest of the Waltham Chase as services and facilities along Winchester Road, the primary road running through the settlement, are all within walking distance of the site. As mentioned above, the site is directly adjacent to the local primary school meaning future residents will have a quick and safe route to school. A carefully detailed scheme would be crafted by ensuring any built development would not go north of the buildings at the Primary School resulting in a development which respects its built surroundings and the open countryside. The northern portion of the site would be an extremely logical place to situate an additional sports field for the settlement. By leaving the southern portion of the site exclusively for the built development this would mean that the integrity and sensitivity of the sites countryside location would not be damaged. Securing this site as an allocation will ensure Waltham Chase will meet any immediate housing requirement along with that of the rest of the Plan period. The site north of Solomons Lane should become an additional allocation for the settlement of Waltham Chase and would also secure the longevity and integrity of the settlement and the sites countryside location.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Supporting information (comments on policies)</a></p>
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<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Stephen Berrow
<b>Personal reference number</b>	ANON-AQTS-32DS-N
<b>Full reference number</b>	ANON-AQTS-32DS-N/3/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Considering in particular the evidence from the IIA assessment in determining the suitability of inclusion in the Local plan of site BW17 (BW4 in Local Plan), as set out in 6.19 p22.</p> <p>Site Ref. BW17. Referencing IIA Report p521, Table 5.45, reproduced in Development Strategy and Site Selection 2024 table under para 6.18 p22, is significantly misrepresentative in a number of areas to the extent as to be potentially misleading in considering the inclusion of site BW17 (BW4) in the Local Plan. The coding of the IIA's for this site should be re-assessed based on the below.</p> <ul style="list-style-type: none"> <li>• It is wholly misrepresentative to suggest under IIA1 and IIA2 that building 100 new dwellings will have a net minor positive effect in reducing emissions (as suggested under IIA Report para 5.398) and improving air quality. Assuming even only 1 net new non-electric car per dwelling (conservative assumption), this would represent a significant increase in the number of cars in the town with resultant increased emissions. The coding as presented in the report should be reassessed in accordance with the net additional emissions caused by the certain increase in cars to the town, and re-coded accordingly (at least minor negative impact if not significantly negative)</li> <li>• It is wholly misrepresentative to suggest under IIA1 and IIA2 that the site would "enhance or promote walking or cycling" any more than other sites within the same proximity to the major facilities of the Town eg sites BW9, BW15, BW11, BW24. While a site such as BW17 is closer proximity to eg the primary school, it is further away from other local amenities such as some local shops (Sainsburys), key services (eg the Veterinary centre on Victoria Road), the doctor's surgery etc. As such, it is misrepresentative to suggest additional dwellings at BW17 would reduce the volume of traffic and promote walking or cycling any more than other sites in the area. The designation under IIA1 and IIA2 should be changed to "Minor Negative Effect Likely", in line with other comparable sites.</li> <li>• The site currently enjoys a wide bio-diversity, including a large range of different species and acting as a natural corridor (akin to extensive hedgerow) enabling safe passage of wildlife through to Dundridge Meadows ancient woodland, Local Nature Reserve and Local Wildlife Site (as referenced per IIA Report para 5.400). It is wholly misrepresentative to suggest that the destruction of this habitat and building of dwellings</li> </ul>



	<p>on the site and other required actions eg tarmacking of roads within the site, would result in anything other than a significant negative effect on the district's bio-diversity (assessed under IIA9).</p> <ul style="list-style-type: none"> <li>• Per IIA Report para 5.400, "Policy BW4 requires that the landscape-led masterplan for the site ensures space is provided for biodiversity net gain within the northern portion of the site" – the achievability of this should be objectively assessed based on a detailed survey of the current site bio-diversity. If it cannot be demonstrated that a net gain is achievable, the site should be removed from the Local Plan or assessed against other potentially more suitable sites eg BW36 or BW12</li> <li>• Per IIA Report para 5.401, in consideration of the impact on landscape (IIA10), states "The effect is uncertain given that the design of any proposal that might come forward for the site is presently unknown.". As such, it is misrepresentative in IIA Report Table 5.45 to show "Site considering mitigation in Policy BW4" as a "Negligible effect likely" and it should instead remain at least in line with "Site BW17" as "Minor negative effect likely".</li> </ul>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	Development Strategy and Site Selection
<b>Name of respondent (or client)</b>	Jonathan Marmont
<b>Personal reference number</b>	ANON-AQTS-32ZM-5
<b>Full reference number</b>	ANON-AQTS-32ZM-5/6/Development Strategy and Site Selection
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>I strongly disagree with the landscape character sensitivity, visual sensitivity and value assigned to sites CU14 and CU34. Landscape Character Sensitivity – with an increasing number of dwellings to the north and east and existing properties to the south, this site is becoming increasingly valued for its character (two commercial operations aside). It affords significant relief to nearby dwellings because it is now the only remaining environmental relief to nearby dwellings as all surrounding fields have been developed. It also makes a significant contribution to the distinctive character and identity of nearby settlements. As such, it could only accommodate limited change with some impact on landscape character. As such, the landscape character sensitivity of this site should be assessed as high – 4. Visual sensitivity – Any development on this site would result in substantial obstruction or complete destruction of the existing view from the residential properties to the north, west and particularly the south. This would result in the complete change in character and composition of the view and the introduction of elements uncharacteristic of a rural setting, particularly as the site sits at an elevation of 22m, above other locations in the vicinity (16m to east and south east, 19m to the west and 21m to the southwest and north). In addition, a public right of way (route 062/9/1 part 2b) passes close-by with views of the site.</p> <p>As such, the visual sensitivity of this site should be assessed as visual sensitivity score 5 – very high.  Value – The sites are located close to a public right of way (route 062/9/1 part 2b) and separate the North Whiteley development from Curbridge to the west and Whiteley to the south.  As such it offers increasingly strong rural character and should be assessed as value score 3 – medium.  Overall Sensitivity – with the above in consideration, the overall sensitivity score should be assessed as high – 12, protection from development is the preferred option.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	Employment Land Study
<b>Name of respondent (or client)</b>	Three Maid LLP
<b>Personal reference number</b>	ANON-AQTS-32F2-P
<b>Full reference number</b>	ANON-AQTS-32F2-P/10/Employment Land Study
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The ELS considers a number of forecast based scenarios to consider the employment needs over the plan period. For industrial land (Use Class B2/B8), the conclusions are based on the average of the forecasted scenarios, which the Council and LSH consider to provide the most robust demand forecast for forecasting future employment needs. The report also takes into account the completions trend which the Council and LSH also consider to provide a robust basis for future industrial land requirements.</p> <p>In our view completions data is not a reasonable or robust basis upon which to consider future need and does not represent a justified approach to plan making in accordance with the Framework. Completions data does not take into account actual need and is reflective of a land use which has been constrained by previous local plan policies.</p> <p>Of particular note, the conclusions that the demand for warehouse and logistics space is predominantly focussed at the smaller end of the B8 market is not reflective of the demand from operators within the market. The past evidence / trend of small units is a result of that being all that has been released through the plan making process. In essence the adopted Local Plan has constrained supply and has not provided sufficient flexibility to accommodate changes within the market.</p> <p>The conclusions of the ELS are that there is a total overall need of between 27.6ha – 38.9 ha of employment land but that there is a supply of 50ha which exceeds the need. This is based wholly upon an approach of re-confirming the existing development plan allocations. For employment these are Bushfield Camp (Policy W5) and Winnall (Policy W6) as well as employment provision within the allocation at St. John Moore Barracks (Policy W2) and the ongoing development of the urban extension at Kings Barton (Policy W1). However, any provision will be part of and ancillary to the main residential uses of both sites. In addition, no consideration has been given to whether these sites are actually deliverable owing to the fact they remained a carried over local plan allocation. The plan makes no reference nor considers the importance of economic growth in the rural proportion of the District to the overall economy of the area.</p> <p>Further information is provided within the submitted letter</p>

<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies and Evidence Base)</a>

<b>Policy/Evidence base document</b>	Housing Topic Paper
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/10/Housing Topic Paper
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24)</p> <p>As set out in the NPPF with regard to a Local Plan - plan period it is expected that 'strategic policies should look ahead over a minimum 15 year period from adoption' (NPPF para 22) and should be reviewed every 5 years. As set out in para 2.2 of Winchester's Housing Topic Paper 2024, work on the new Local Plan started in 2018 which was 5 years on from the adoption of the Core Strategy. This also coincided with the updating of the NPPF and introduction of the SM for assessing local housing need. A 20-year plan period was expected, to give 15 years from plan adoption.</p> <p>The Housing Topic Paper sets out in para 2.4 that a revised plan period of April 2020 to March 2040 is proposed for the Reg 19 Local Plan (amended from 2019 to 2039 under the Reg 18 Local Plan). If the Council do continue to submit the Plan for examination in time for it to be examined under the existing NPPF and is successful in quickly progressing through the examination to allow adoption of the Plan next year (all of which, as will be set out, is considered highly questionable), then the Plan will only just cover the bare minimum 15 years from adoption. Given this point, it is considered appropriate to further extend the plan period, to allow for any delays in the process, and to ensure the 15 years at least is covered. However, on this point it is also acknowledged, that given the circumstances regarding the updated SM this may be a moot point as the Council would be required to immediately review the Plan following adoption, if the Council does not meet the updated housing numbers.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a>  <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a>  <a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a>  <a href="#">Supporting document 3 (Preliminary Flood Risk and Drainage Review)</a>  <a href="#">Supporting document 4 (Heritage Appraisal)</a>  <a href="#">Supporting document 5 (Map - Compliant Site Access)</a>  <a href="#">Supporting document 6 (Local Plan Site Promotion - Transport)</a></p>

<b>Policy/Evidence base document</b>	Infrastructure Delivery Plan
<b>Name of respondent (or client)</b>	Patrick Blake
<b>Personal reference number</b>	BHLF-AQTS-32QF-N - National Highways
<b>Full reference number</b>	BHLF-AQTS-32QF-N - National Highways/7/Infrastructure Delivery Plan
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>To ensure that the Local Plan is deliverable, the transport evidence base should demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work forms a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation that the plan and its allocations are reliant upon has a reasonable prospect of delivery within the timescales of when the identified growth is planned. As noted above, significant work has been undertaken to date on the Strategic Transport Assessment.</p> <p>The Infrastructure Delivery Plan (IDP) document relies on the M3 J9 upgrade being completed. Whilst this is committed and construction is underway, there is not currently a fixed date for completion. Completion is expected to be within the third road period (2025-2030). As set out above, the agreed mitigation package for Bushfield may necessitate future updates to the IDP.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b>	No



*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Neighbouring Local Plans
<b>Name of respondent (or client)</b>	Jamie Matthews .. Clerk
<b>Personal reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council
<b>Full reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council/8/Neighbouring Local Plans
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Other local,plans contiguous to WCC inc Test valley, Basingstoke, Eastleigh, Fareham, havant - All relevant in order to show duty to cooperate
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	Policies Map
<b>Name of respondent (or client)</b>	Peter Nicholas Homes
<b>Personal reference number</b>	ANON-AQTS-3296-D
<b>Full reference number</b>	ANON-AQTS-3296-D/2/ Policies Map
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	NE7 - Denmead/Waterlooville Settlement Gap, specifically SHELAA sites DEN22 & DEN23 and the Furzeley Village proposal
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Commenting on policies and policies map)</a> <a href="#">Supporting document 2 (Vision document - Furzeley Village, Denmead)</a>

<b>Policy/Evidence base document</b>	Policies Map
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/7/ Policies Map
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) Indeed para 14.158, which includes supporting text for Policy OT01 it is stated that the Parish Council have requested that the settlement boundary only be extended to include the developable part of the site. Although whilst the Policies map accessible from the Reg 19 consultation page includes proposed allocations, there appears to be only access to the existing settlement boundaries. If indeed they are amending these to include the proposed allocations (as should be the case) it is queried as to why the Policies map has not been updated to reflect this and we question whether the Council is amending the settlement boundary to include the developable part of OT01 or not, if they are this should be appropriately consulted upon.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	Yes <a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a> <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a> <a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 3 \(Preliminary Flood Risk and Drainage Review\)](#)

[Supporting document 4 \(Heritage Appraisal\)](#)

[Supporting document 5 \(Map - Compliant Site Access\)](#)

[Supporting document 6 \(Local Plan Site Promotion - Transport\)](#)

<b>Policy/Evidence base document</b>	Policies Map
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/41/ Policies Map
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Policy WK5 should be expanded to the north to include land WI06. Further details are included in our representation in relation to Policy WK5
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies, policies map and evidence base)</a> <a href="#">Vision document (Land At Mill Lane, Wickham)</a>

<b>Policy/Evidence base document</b>	Policies Map
<b>Name of respondent (or client)</b>	Herbgrove Ltd
<b>Personal reference number</b>	ANON-AQTS-32NK-Q
<b>Full reference number</b>	ANON-AQTS-32NK-Q/2/ Policies Map
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Proposals Map - Cross Reference to Policy NE10 Protecting Open Areas  Land at St Cross Road / Grange Road, Winchester, SO23 9RT This representation on behalf of Herbgrove Ltd seeks the removal of the protected open space designation (under Proposed Policy NE10 in the Regulation 19 consultation plan) on three small areas of land at the junction of St Cross Road with Grange Road and land on Grange Road.</p> <p>These small areas of land are incidental land remaining from my client's residential development and refurbishment of dwellings at Grange Road around 2004. Paragraph 102 and 103 of the NPPF requires the protection of a network of high quality open spaces which and particularly references protection of open space, sports and recreational buildings and land. There is a clear requirement for, and a benefit in, a Local Plan Policy which protects important areas of open space within the City as sought by the NPPF. There are significant areas of open space and recreation in the city as detailed in the Open Space Assessment (2022). This includes a number of spaces close to Grange Road including St Faiths Meadow, St Cross Meadow and St Cross Cricket Club.</p> <p>Section 4 of the Open Space Assessment concludes that there is a surplus of open space provision in the St Michael's Ward in which the sites subject of this representation are located. Planning policy should relate to important larger open spaces for sport and recreation, large open spaces and recreational spaces and other significant provision including protecting open spaces around the historic buildings in the centre of the city to protect their setting.</p> <p>The land subject to this representation is very small and much smaller than other open space area allocations in the ward and wider area. The land detailed on Plan 5996 comprises grass with some tree and shrub planting.</p> <p>The area on the site frontage is adjacent to modern housing development which backs onto St Cross Road with domestic features including close boarded fencing and a bus stop adjacent. It is not actively used and has no features to encourage active use such as seating areas or informal play. Indeed the frontage area of</p>

	<p>land is very close to the busy St Cross Road. A protected open space designation is onerous both in its purpose and in its application on a key route and highly sustainable location in the city which should be the focus appropriate and high quality new residential development. These sites are effectively windfall sites and any planning application should be subject to an assessment against the relevant planning policies.</p> <p>The key green open space and recreation character in this location is through the extensive area of vegetation to the south of the site fronting St Cross Road and in the open cricket ground and meadows on the opposite side of the road. The other two areas of land further up into Grange Road are effectively landscaping and incidental space typical of any housing area. It is not considered appropriate in the context of national policy (including in the context of the recent consultation on the NPPF and requirement to utilise brownfield land) that such areas are covered with restrictive formal open space designations.</p> <p>These small areas of land do not have an important amenity, biodiversity, heritage or recreational value that could not be maintained and potentially enhanced (such as the response to the frontage conservation area setting onto St Cross Road) through a well-considered development and reconfiguration of the sites. This land should be a focus for assessment as part of meeting demand for sustainable new housing within the city boundary.</p> <p>We therefore seek the removal of land at St Cross Road and Grange Road (as detailed on Plan 5996) from the 'Protected Open Areas' designation on the Winchester Local Plan Proposals map and hence the requirements of Proposed Policy NE10. The land should be identified only as land within the city built up settlement boundary. A separate but related representation has been submitted in relation to concerns for the soundness of the Local Plan and the extent of land including within protected open space designations under Policy NE10.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Supporting document (map - Land at Grange Close, Winchester)</a></p>



*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Policies Map
<b>Name of respondent (or client)</b>	Frobisher Developments Ltd
<b>Personal reference number</b>	ANON-AQTS-32ZY-H
<b>Full reference number</b>	ANON-AQTS-32ZY-H/1/ Policies Map
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The inclusion of Little Park Farm (PO15 5SN) within the settlement policy boundary H4 is supported. The site lies next to an allocation for commercial use at Little Park Farm in Fareham Borough which is part of a parcel of land framed by a mainline railway and motorway with link road, beyond which lies commercial and residential properties which surround it on the southern and western boundaries. The adjacent site includes commercial and residential uses.</p> <p>The area very much lies in a urban environment. Its inclusion is therefore appropriate.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	No

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Policies Map
<b>Name of respondent (or client)</b>	Star Energy Group plc
<b>Personal reference number</b>	BHLF-AQTS-32YG-X
<b>Full reference number</b>	BHLF-AQTS-32YG-X/4/ Policies Map
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The new Policies Map should therefore show Hampshire Mineral Safeguarded Areas and the corresponding Mineral Consultation Areas. These policy designations are crucial to ensure that mineral sites are protected from non-mineral development that could prejudice their operation. National Planning Practice Guidance and both the adopted and emerging Hampshire Minerals and Waste Local Plan state that the MSA and MCA should be reflected on the District Policy Map. The addition of MSA/MCA to the Winchester Local Plan Policy Map will contribute to fulfilling the role that District planning policy should play in minerals planning. The clear identification of these areas across the Development Plan will also help applicants to understand minerals planning and aid the preparation of their planning applications. This has clear benefits for the LPA, MPA, applicants and mineral operators and enhances the clarity and efficiency of the planning process.</p> <p>To supplement this, it is considered that a Mineral Safeguarding Area policy should be included which confirms that consideration will be given to the Minerals and Waste Local Plan in determining planning applications for non-minerals development in MSA, and also that Hampshire County Council will be consulted on all applications within an MCA.</p> <p>The new Local Plan should also incorporate the Agent of Change principle which is established at Paragraph 193 of the NPPF. At present, the draft Local Plan does not include sufficient protection for existing businesses. The draft Local Plan focusses on carbon mitigation and energy efficiency by including a range of green policies. Whilst it is essential that the UK mitigates and adapts to climate change, the new Local Plan must deliver a balance between mitigating carbon emissions whilst also not unduly stifling economic development, including mineral development. The NPPF prioritises economic growth, and this should also be a key theme of the new Local Plan. In addition, it must be recognised that certain forms of development are more energy intensive than others and whilst it is possible to mitigate carbon emissions, it is inevitable that certain development will emit more carbon emissions than they could possibly offset.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (Commenting on policies and policies map)</a>  <a href="#">Letter (Commenting on policies and policies map)</a></p>

<b>Policy/Evidence base document</b>	Renewable Energy Study for Winchester District Development Framework (December 2008)
<b>Name of respondent (or client)</b>	Bill Gunyon
<b>Personal reference number</b>	ANON-AQTS-3BR7-Q
<b>Full reference number</b>	ANON-AQTS-3BR7-Q/2/Renewable Energy Study for Winchester District Development Framework (December 2008)
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Technical and financial considerations of the potential of renewable energy have changed beyond recognition since 2008. Utility companies might be very surprised to find this document listed. The text of paras 4.40 and 4.41 is inappropriately influenced by the Study (see my response in Carbon Neutrality and Designing Low Carbon Infrastructure CN5).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Setting Of Winchester Report
<b>Name of respondent (or client)</b>	Jamie Matthews .. Clerk
<b>Personal reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council
<b>Full reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council/6/Setting Of Winchester Report
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	The Setting of Winchester Report prepared for City of Winchester Trust with HCC and other support 2008(?) - This demonstrates the particular qualities of landscape importance for the whole of the surrounds of the City . The South in which Bushfield is sited is shown to be particularly significant in cultural as well as landscape terms
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	Settlement Gap Review
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/20/Settlement Gap Review
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>In supporting a sound local plan which adequately meets the needs of Winchester through the local plan period, it is vital that the evidence base is robust and accurate. Accordingly, tor&amp;co has been appointed by Bargate Homes to undertake an independent review of Winchester City Council’s Settlement Gap Review, prepared by LUC in July 2024, which informs draft Policy NE7. This review is desk-based, appraising published documents and reports pertaining to settlement gaps, including comparable studies prepared for the South Hampshire sub-region. A site visit to the settlement gaps assessed by Winchester Council was not undertaken, as such this review doesn’t comment on the specific findings for each of the settlement gaps, but rather appraises the general approach and methodology adopted by LUC. This review first considered the evidence base, policy context and published guidance, before critiquing the report’s approach, methodology and conformity with best practice. This review was undertaken by a chartered Landscape Architect.</p> <p>The July 2024 Settlement Gap Review by LUC (hereafter referred to as the LUC Review). Therefore, while the LUC Review is based on proceeding settlement gap studies (dating back to County Structure Plans), it is relevant to note that the report was envisaged as a ‘comprehensive review’ that would form the principal evidence base to support the emerging local plan policy on Settlement Gaps (draft policy NE7). No reference is made to subsequent studies within the LUC 2024 Report. As such, it is understood that the ‘project scope’ is intended to be comprehensive and subsequent assessment work is not proposed to augment the key findings. While there is no definitive methodology for settlement gaps, a number of assessments have been prepared by the local authorities listed above (within the South Hampshire sub-region). These have been referred to in order to determine a best practice approach to settlement gap assessments, with the following two recent studies specifically referenced:</p> <ul style="list-style-type: none"> <li>• Eastleigh Borough Settlement Gap Study, October 2020 (Deacon Design)</li> <li>• Test Valley Borough Council: Local Gap Assessment, December 2023 (Stephenson Halliday)</li> </ul> <p>Policy Context and Regional Guidance</p> <p>The PUSH 2008 Policy Framework for Gaps set out the key criteria that should be used by local planning authorities to select locations for the designation of gaps in South Hampshire, namely:</p>

- The open nature/sense of separation between settlement cannot retained by other policy designations;
  - The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence.
  - In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.
- The guidance goes on to state: “Local Development Documents will identify the location of the gap(s) and include a policy and ancillary documentation which show on an Ordnance Survey map base the extent of land included within the gap(s). The policy will set out the types of development which will be permitted within the gap(s) based on the principle that development within Gaps will only be permitted if:-
- a) it would not diminish the physical and/or visual separation of settlements; and
  - b) it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.”

PfSH December 2023 Spatial Position Statement, provides more up to date guidance. Please refer to para 6.101. The Meon Valley is identified as a strategic gap of sub-regional strategic significance and should be protected from inappropriate development. In addition to this area, Councils should identify in their local plans other strategic countryside gaps of sub-regional significance as appropriate; and may also identify local countryside gaps which are of fundamental local importance in their area. The precise extent of the Meon and other gaps will be defined in local plans. Given the long-term need for development, the number and extent of gaps should only be that needed to achieve their purpose. No reference is made to settlement gaps (strategic or local) within the NPPF and there is no requirement for local authorities to allocate them as part of the plan making process. Hampshire County Council had, however, previously designated strategic gaps through various iterations of Structure Plans and, along with local gaps, these were later incorporated within local plans, including Winchester City Council’s adopted local plan (parts 1 and 2). The principle of including settlement gaps within local plans has been tested and was found by the Inspector to be in line with national policy as part of the examination into the Test Valley Revised Local Plan dated 15 December 2015. The 2013 Winchester District Local Plan Part 1 Joint Core Strategy combined ‘strategic’ and ‘local’ gap and referred to them as settlement gaps. Local Plan Policy CP18 (contained in Part 1) is the current policy for Settlement Gaps, which is referenced in full within the LUC Review. The emerging Winchester Local Plan has carried forward the settlement gaps under Policy NE7, which is currently drafted (Online version: Reg 19 Proposed Submission Local Plan 2020 -2040) as follows:

“The local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps:

- i. Bishop’s Waltham – Swanmore – Waltham Chase – Shedfield –Shirrell Heath
- ii. Denmead – Waterlooville
- iii. Kings Worthy - Abbots Worthy

- iv. Otterbourne – Southdown
- v. Winchester – Compton Street
- vi. Winchester – Kings Worthy/Headbourne Worthy
- vii. Winchester – Littleton
- viii. Whiteley – Fareham/Fareham Western Wards (the ‘Meon Gap’)
- ix. Knowle, Wickham and Welborne”

Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.”

tor&co Review. Based on the above policy context and sub-regional guidance, tor&co’s review of Winchester City Council’s Settlement Gap Review, prepared by LUC in July 2024 has determined the following. LUC Review the approach to the assessment is set out. The approach is not clear, in particular the first bullet which states:

- Define an area of assessment encompassing all land where development has some degree of potential to reduce separation. This includes all land between settlements rather than just the land currently defined as settlement gaps. The underlined text is either replicating the approach set out under bullet 4 or it is referring to a wider area of study ‘between settlements’. If it is the latter, the statement would appear to contradict the statements under para.1.9 which confirms that the Council (rather than LUC’s study) discounted considering establishing other gaps on the ‘basis of distance between settlements, extent current development proposals and the level of protection provided by other Natural Environment policies)’
- The LUC Review provides no information on this, but para. 1.10 confirms that the Council will review this position if and when new masterplans come forward. This raises the potential of new settlement gaps being created in the future in response to a new development proposal, rather the 2024 LUC Review providing a comprehensive re-appraisal of settlement gaps now that can provide a ‘definitive’ spatial strategy for the duration of the emerging local plan.

Indeed, the study only re-appraises 7 or 9 existing settlement gaps and does not consider at all other land between settlements within the wider district. In para. 1.4, the LUC Review highlights that Local Plan Part 2 (2017) included a partial review of settlement gaps, but no information is provided on the scope of this partial review or its findings. It is not clear if, or how, this informed the subsequent 2024 assessment by LUC. The policy context with the LUC Review provides a reasonably complete summary. It is noted, however, that the wording for the Policy NE7 as drafted is different to the online Reg 18 and Reg 19 versions of the 2020-2040 local plan. The extract within the LUC Review includes the wording ‘Any development should not cause harm to the character and landscape of the area.’ This statement appears at odds with agreed stated purpose of settlement gaps which is not to protect valued landscapes or their character, but rather settlement separation and identity. The LUC Review recommended in the Policy recommendations (page 38) that this sentence be omitted from Policy NE7, which this review concurs with. It is noted that it has been omitted in

the Reg 19 version of Policy NE7. The section on Reg 18 Consultant responses (page 11) is extremely brief, and does not appear to have influenced the approach to the assessment. Appeal decisions are referenced in para.2.6, but no information is provided. By comparison, a comprehensive summary of planning appeals is provided within chapter 3 of the Test Valley Borough Council: Local Gap Assessment.

#### LUC Review: Methodology

There are a number of issues associated with the methodology. Some of these appear to be drafting errors, but several are more fundamental to the way the assessment has been undertaken. The text on Approach and Evaluation is repeated (pages 16 and 17). Text is repeated again at paragraphs 4.23 to 4.24. There is not a comprehensive summary of source material, including a list of existing baseline reports that informed the assessment, such as landscape character and sensitivity studies, ecology and conservation appraisals, local design guides or neighbourhood plans and supporting studies. The LUC Review includes a single plan for each settlement gap assessment within appendix A. There are no supporting baseline plan, photographs or analytical plans to support the conclusions. For example, topography is often referenced as being a decisive factor in terms of intervisibility and the perception of separation, but no plans are provided to portray this or highlight key features, such as ridgelines. The assessment appears to be solely desk-based, with no site visit or fieldwork analysis undertaken (although the methodology is not clear on this). The absence of any fieldwork is considered to be a significant omission and draws into question the validity of the report's findings. As noted later, in particular this raises concerns regarding the methodology adopted to appraise 'the strength of each gap, taking into consideration its contribution to settlement setting, the degree of physical and visual separation it provides, and the extent of urbanising influences.' (bullet two of the approach to appraising gaps on page 14). By comparison, the methodology adopted for the Eastleigh Borough Settlement Gap Study, October 2020 (Deacon Design), included a simple phased approach, starting with desktop analysis, followed by fieldwork and concluding with the analysis evaluation stage. With respect to the fieldwork, the methodology on page 9 of the Eastleigh Borough Settlement Gap Study states: "Once the desktop study was complete the assessment team carried out fieldwork to verify the findings of the desktop study and capture a visual and perceptual survey of the Gaps. Maps and plans prepared during the desktop study were annotated with additional field survey findings. Following the fieldwork, final annotated maps, descriptions and characterisation of Gaps including the relevant settlement edges were prepared." The fieldwork included a photographic survey, and states: 'Photographs were recorded from key viewpoints, especially from settlement edges, to illustrate the character of the Gaps and the visual perception of settlement separation and Gap openness. Photographs were taken within and outside the Gaps to illustrate potential changes to Gap boundaries and the minimal distances required to prevent visual coalescence of settlements with each other or other urbanising elements within the Gaps.'

The Test Valley Borough Council: Local Gap 2023 Assessment similarly included fieldwork analysis, the purpose of which was to verify the initial findings of the desktop study. Para.2.1.12 of that report states:

'Fieldwork, reporting and recommendations: This stage used the assessment proforma in the field to gather data and evidence in relation to the existing Local Gaps, to test the baseline gathered in the above desk study, to confirm boundaries and identify opportunities with respect to enhancement, integration and mitigation potential. Field survey was supported by the taking of geo-located digital photographs as part of the evidence base.' These critical assessment techniques and stages do not appear to have been completed by LUC. Indeed, there is very little information on how key factors such as inter-visibility, visual separation or the extent of urbanising features has been assessed. The criteria outlined within the methodology appear to be based solely on the information contained on the Settlement Gap Review plans in appendix A and it is assumed reference to Google Maps (although this is also not stated). The Eastleigh and Test Valley assessment are, by comparison, transparent about what was assessed at each stage of the process. How landscape factors, landscape value, landscape character, visual amenity and landscape sensitivity have informed the assessment is not clear, with no reference to supporting assessments such as the relevant LCA or settlements descriptions.

The Landscape Institute's Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition is not referenced. Whilst the GLVIA is not directly relevant to the assessment of settlement gaps, its guiding principles help with identifying, understanding and assessing the character and value of a landscape, alongside published landscape character areas (LCA). In describing landscape, paragraph 2.19 of the GLVIA states that, "Landscape results from the interplay of the physical, natural and cultural components of our surroundings. Different combinations of these elements and their spatial distribution create the distinctive character of landscapes in different places, allowing different landscapes to be mapped, analysed and described. Character is not just about the physical elements and features that make up a landscape, but also embraces the aesthetic, perceptual and experiential aspects of the landscape that make different places distinctive." GLVIA also emphasises the importance of adopting and recording a transparent methodology. The LUC Review is sub-standard in this regard. While measurements of settlement gaps are stated, distances are not consistently noted or shown on any of the supporting plans. While this is only one factor that should be considered, a systematic analysis of each gap should have been adopted.

Para 3.11 states "the evaluation for each gap uses professional judgement to weigh up three aspects of settlement separation". It is not stated if this was a professional Landscape Architect or another suitably qualified professional. Para. 3.13 states "Gaps were assessed on the assumption that allocated sites will be developed in accordance with Local Plan policies. Where development has been consented, consideration was given to any masterplans when assessing the role of boundary features in maintaining settlement separation." The report provides no information on consented masterplans other than to plot the allocation on the plans in appendix A. It is not clear therefore if factors such as the spatial arrangement of a masterplan or scale of built form has been factored in. By way of example, for the Winchester – Kings Worthy – Headbourne Worthy Gap (pages 75 to 79), Barton Farm represents a major new development area that is substantially built-out. No information on the development is provided to support the summary text or conclusions.

	<p>In terms of physical and visual separation, para 3.16, first bullet concludes by stating “A very visible, strongly defined development edge would not typically be considered a strong boundary to further development, but if it was a consistent boundary over some distance that would increase its contribution.”</p> <p>A strongly defined boundary is, in nearly all instances, more likely to create a definitive settlement edge than an ill- defined, weak development edge. How visible the development edge is separate factor, but must be appraised on a site-specific basis rather than as a generic principle as noted above. These factors can only be adequately appraised by undertaking fieldwork, which does not appear to have been the case.</p> <p>The recommendations currently do not relate back to the key PUSH guidance or LUC initial evaluation process of settlement setting/physical and visual separation/urbanising influences. The LUC Review use different sub headings of ‘gap strength’ and or ‘key characteristics of settlement gap’ or ‘gap strength and key characteristics’. Overall there is a lack of response to original scope of the review which was to ‘consider evidence to support the definition of settlement gaps and the potential for alterations of the gap boundaries’. No commentary or reassessment has been carried out of the previous settlement assessments undertaken to inform Policy CP18 of the 2013 Local Plan. The report does not clarify whether all or part of the current settlement gaps perform in accordance with the ‘definition’ of a settlement gap in order to make judgements as to whether the boundaries should be adjusted, either expanding or reducing. The definition (of evaluation of the appropriateness) of a settlement gap should be judged against the criteria set out by PfSH. By example, the Eastleigh Settlement Gap study attempted to do this with a criteria check table. There is not a comprehensive summary of the source material referenced to inform the assessment. There are several issues with the methodology adopted, as detailed above. The apparent absence of any fieldwork and supporting plans / photographs to verify the desk-based findings is considered to be a significant flaw in the assessment process, and raises material concerns regarding the validity of the key findings.</p> <p>In ensuring that the local plan is soundly based, and specifically in the context of draft Policy NE7, is prepared on the basis of an accurate evidence base, this needs to be reviewed and updated as a priority.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	Settlement Gap Review
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/15/Settlement Gap Review
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Review of Settlement Gaps (RoSG) July 2024 Paragraph 1.8 of the RoSG confirms that Littleton/Winchester settlement gap has not been analysed in the Settlement Gap Review due to the ongoing masterplanning for the Sir John Moore Barracks allocations. This masterplanning process will determine the extent of built development, which will in turn inform any future review of the settlement gap, so analysing the settlement gap now would be premature.' Whilst this is noted, it is not considered that a review would be premature in the context of potential site allocations within the Settlement Gap, including my client's land interests. This included a review of the impact of the proposed Policy W4 allocation on the Winchester-Headbourne Worthy/Kings Worthy Gap for example, though the relevant justification at paragraph 4.39 is very limited.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>



*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Settlement Gap Review
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TA-K
<b>Full reference number</b>	ANON-AQTS-32TA-K/7/Settlement Gap Review
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>As set out in our comments on site allocations in Swanmore, the Gap Review has a number of failings and does not follow best practice. Firstly, it does not appear that the Gap Review has been informed by site visits. This is critical to ensure a full appreciation of the contribution that land parcels make to the Gap and to allow for a full assessment against the relevant criteria. Secondly, the Settlement Gap Review (July 2024) fails to consider if all of the land within the Waltham Chase to Bishops Waltham Gap is necessary to prevent the coalescence of the settlements, having regard to maintaining their physical and visual separation, as per Partnership for South Hampshire guidance 'Policy Framework for Gaps' (2008).</p> <p>We contend that it is not necessary to include SWA10 within the gap. Indeed, paragraph 4.9 of the Gap Review states: "The following features are important in retaining a sense of separation between Bishop's Waltham and Swanmore:</p> <ul style="list-style-type: none"> <li>• Maintenance of the gap between the edge of Swanmore and the cluster of buildings that includes Hoe Farm, so that the rural character of the latter is retained."</li> </ul> <p>The Gap Review does not explain the significance of the cluster of buildings that includes Hoe Farm. Nonetheless, there is a large field parcel and a road (Paradise Lane) lying between this group of buildings and SWA10, with boundary vegetation along the boundaries of the field parcel. It is considered that that SWA10 could be developed with a comprehensive landscaping scheme to ensure that the rural character of the cluster of buildings to the west would be maintained.</p> <p>As such, SWA10 would not conflict with the identified important features of the gap and should not constitute a reason for discounting it as an allocation.</p> <p>Additional evidence is required in the form of a comprehensive Gap Review, in line with best practice.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	Settlement Gap Review
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3BPV-M
<b>Full reference number</b>	ANON-AQTS-3BPV-M/7/Settlement Gap Review
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>As set out in our comments on site allocations in Waltham Chase, the Gap Review has a number of failings and does not follow best practice. Firstly, it does not appear that the Gap Review has been informed by site visits. This is critical to ensure a full appreciation of the contribution that land parcels make to the Gap and to allow for a full assessment against the relevant criteria. Secondly, the Settlement Gap Review (July 2024) fails to consider if all of the land within the Waltham Chase to Swanmore Gap is necessary to prevent the coalescence of the settlements, having regard to maintaining their physical and visual separation, as per Partnership for South Hampshire guidance ‘Policy Framework for Gaps’ (2008). We contend that it is not necessary to include SH11 within the gap. Indeed, paragraph 4.10 of the Settlement Gap Review states “The following features are important in retaining a sense of separation between Waltham Chase and Swanmore:</p> <ul style="list-style-type: none"> <li>• Tree cover that limits the visual impact of development in the settlement gap.</li> <li>• The retention of field boundaries and agricultural land use.</li> <li>• The avoidance of further infilling of development along connecting roads.”</li> </ul> <p>In respect of tree cover, no trees would need to be removed to bring forward SH11 and additional trees would be planted as part of a comprehensive landscaping scheme. Whilst the land use would change from agricultural to residential, the scheme could be designed in a sympathetic manner, retaining existing field boundaries. The development would represent a rounding off of the settlement rather than infilling. As such, SH11 would not conflict with the identified important features of the gap and should not constitute a reason for discounting it as an allocation. Additional evidence is required in the form of a comprehensive Gap Review, in line with best practice.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (comment on Policies and Evidence Base - includes tables)</a>  <a href="#">Supporting document 1 (Transport advice - Land north of Meon Green, Forest Road, Waltham Chase)</a>  <a href="#">Supporting document 2 (Vision Document - Land South of Lower Chase Road, Waltham Chase)</a></p>

<b>Policy/Evidence base document</b>	Settlement Gap Review
<b>Name of respondent (or client)</b>	VIVID Housing
<b>Personal reference number</b>	BHLF-AQTS-3287-D
<b>Full reference number</b>	BHLF-AQTS-3287-D/3/Settlement Gap Review
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Settlement Gap Review should be expanded.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Jill Lee
<b>Personal reference number</b>	ANON-AQTS-3B83-S
<b>Full reference number</b>	ANON-AQTS-3B83-S/3/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>This has been consistently wrong in respect of South Wonston. The additional scores awarded to South Wonston for having an hourly bus service, doctor's surgery and high speed broadband led to it being included as an intermediate settlement suitable to take a housing target. Now that the council has finally accepted that South Wonston does not have a doctor's surgery or hourly bus service it hasn't reassessed whether or not it should still be in that category and we say it shouldn't. The points for high speed broadband have still not been corrected. If they were then South Wonston would not score sufficient points to be in that group of settlements. Where is the common sense here?</p> <p>This should be important to the council because it is effectively allocating houses in a settlement with few facilities and services which has also been identified in the IIA as already having the highest levels emissions per capita from commuting. This document and the IIA should be corrected, South Wonston should be downgraded and the housing allocation removed.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b>	No

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/55/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Identifies incorrectly Colden Common as a sustainable area for development despite poor provision of services and poor public transport and no cycle routes.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TT-6
<b>Full reference number</b>	ANON-AQTS-32TT-6/5/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>We support the categorisation of Kings Worthy within the larger rural settlements tier of the settlement hierarchy and, accordingly, it is very well placed to accommodate new development. Kings Worthy has a wide range of existing facilities including 3 no. convenience stores, a pre-school, a primary school, a daily bus service providing services to Winchester and, by effect, onward linkages to high order locations via the train station, a GP surgery, employment opportunities, recreational facilities including children's play equipment and other community facilities (church, 2 no. public houses) and other local facilities such as sports therapists, acupuncturists, pilates coaching and a wellness facility. Geographically, Kings Worthy functions as an extension of Winchester and is well placed to provide housing within easy commuting distance to support the economy of Winchester itself as the highest order settlement in the District. As set out above, the bus services and, by inference, the connection to the train station, also provide sustainable connections beyond both Kings Worthy and Winchester. Given the above, both Kings Worthy is perfectly placed to accommodate additional open market and affordable housing to support and bolster existing facilities to the benefit of existing and prospective residents.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Supporting information (Illustrative concept masterplan)</a> <a href="#">Supporting information (Copy of letter re: Land at Springvale Road, Kings Worthy)</a></p>
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<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TA-K
<b>Full reference number</b>	ANON-AQTS-32TA-K/5/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	We support the recategorisation of Swanmore as a larger rural settlement within the Settlement Hierarchy Review (SHR) 2024. This now correctly recognises that the level of services and facilities on offer within the settlement and confirms that it represents a sustainable location for new development. This includes a primary school, secondary school, large commercial and employment area, daily bus service, post office, public houses, church, recreational facilities including children's play equipment, hairdresser and convenience store.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3BPV-M
<b>Full reference number</b>	ANON-AQTS-3BPV-M/5/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>There are a number of issues with the latest SHR and its revised methodology, which fail to properly acknowledge the range of services and facilities in Waltham Chase. Firstly, whilst we note that the 2024 update acknowledges that the village post office has now re-opened, an extra point should be applied to recognise that it is open more than five days a week, as per the scoring in the 2021 SHR. Secondly, the SHR continues to group churches, pubs, village halls and cafe/restaurants into a single category 'Facility for Community to Congregate'. We do not accept the Council's response that "there is enough scope for these facilities to be used in more than one way – for instance, cafes in village halls - to justify their grouping together as one common function". Each of these facilities serves its own purpose, rather than just as a place to congregate. If a resident does not have access to one of these facilities, they are more likely to travel elsewhere rather than to one of the other facilities within the group. By grouping them together the SHR fails to recognise this important point. The SHR should be amended to apply a score to each of these facilities present in the settlement, as per the 2021 SHR. Waltham Chase benefits from all such facilities and its scoring should be increased from 2 to 4. Thirdly, the SHR is a crude tool for assessing the sustainability of a settlement. For example, Waltham Chase lies within walking distance of Swanmore, with Swanmore College lying within 800m of the settlement. The SHR fails to allow for such circumstances as it focuses on services and facilities within the subject settlement. The revised scoring for Waltham Chase highlighted above would increase its score from 20 to 23 points. This is above the threshold for the 'larger rural settlements' tier. For all of the above reasons, the 2024 SHR should be revised, and Waltham Chase should be re-instated as a 'larger rural settlement' within the settlement hierarchy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (comment on Policies and Evidence Base - includes tables)</a> <a href="#">Supporting document 1 (Transport advice - Land north of Meon Green, Forest Road, Waltham Chase)</a> <a href="#">Supporting document 2 (Vision Document - Land South of Lower Chase Road, Waltham Chase)</a>

<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Philip Lee
<b>Personal reference number</b>	ANON-AQTS-3B5P-K
<b>Full reference number</b>	ANON-AQTS-3B5P-K/2/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>This has been consistently wrong in respect of South Wonston. The additional scores awarded to South Wonston for having an hourly bus service, doctor's surgery and high speed broadband led to it being included as an intermediate settlement suitable to take a housing target. Now that the council has finally accepted that South Wonston does not have a doctor's surgery or hourly bus service it hasn't reassessed whether or not it should still be in that category and we say it shouldn't. The points for high speed broadband have still not been corrected. Giving South Wonston 2 points for employment opportunity is totally wrong- there is none. Winchester scores 2 pointw, what person could possibly think that South Wonston has the same employemnt opportunity as the city of Winchester ? If they were then South Wonston would not score sufficient points to be in that group of settlements. Where is the common sense here? This should be important to the council because it is effectively allocating houses in a settlement with few facilities and services which has also been identified in the IIA as already having the highest levels emissions per capita from commuting. This document and the IIA should be corrected, South Wonston should be downgraded and the housing allocation removed.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	



<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Bargate Homes   Jonathan Quarrell
<b>Personal reference number</b>	BHLF-AQTS-3288-E
<b>Full reference number</b>	BHLF-AQTS-3288-E/9/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Waltham Chase is a sustainable location and higher order settlement with a good range of facilities and services, as identified in the Settlement Hierarchy Report of November 2022 and can provide additional land for development. Waltham Chase scored very well for 'daily facilities / services' scoring 18 from a possible 20. Of all the 49 settlements listed in the settlement hierarchy, only Winchester scored a maximum 20. 19 was not a possible score, and so Waltham Chase scored joint second in the hierarchy, with a score of 18. Waltham Chase only lost two points for not having access to a main line train station. For day to day services Waltham Chase scored the same score as Bishop's Waltham, Colden Common, Hursley, Kings Worthy, Newlands, New Alresford, South Wonston, Swanmore, Whiteley and Wickam. Despite such a high score, Waltham Chase should still be scored higher. There are some flaws with the methodology of the Settlement Hierarchy. For example, Waltham Chase did not receive a point for having a secondary school within its settlement boundary. The Settlement Hierarchy is therefore blind to the realities on the ground.</p> <p>Residents of Waltham Chase have incredibly good access to Swanmore College which is built on the south-western edge of Swanmore. Because Swanmore is its own settlement when judged by the Settlement Hierarchy only Swanmore receives the points in the scoring matrix. A travel distance scoring system would be fairer and more logical. For example, it is just a 1,000 metre walk from the convenience store in the centre of Waltham Chase to the school gate. Those living in the northern part of Swanmore would have a longer walk to school from their homes to Swanmore College than most residents of Waltham Chase. It is therefore an error that Waltham Chase does not score a point for having a secondary school. It also appears that Swanmore scored points for having access to outdoor sports facilities, which includes the community use of the facilities at Swanmore College. By default, Waltham Chase should benefit from this point too. In our opinion, Waltham Chase, which scored well in the settlement hierarchy should be accommodating more growth in order to achieve even more sustainable patterns of growth.</p> <p>We acknowledge that policy H3 splits the 3,825 homes in the MTRA into commitments and new allocations spread between five market towns, five larger rural settlements, five intermediate settlements, and the</p>

remaining rural area. The five larger rural settlements are Colden Common, Denmead, Kings Worthy, Swanmore and Wickham. 41

We note that the formal Representations submitted by Bargate Homes included objections relating to the Settlement Hierarchy Review (2022), including an identification of many flaws in the overall methodology and alarmingly the decision taken by the Council to downgrade the status of Waltham Chase to an 'Intermediate Rural Settlement' at the request of the Parish Council. We object to this and strongly advocate that Waltham Chase should fall within the larger rural settlement tier given the sustainability credentials of the settlement. We consider this unjustified downgrading of the settlement is, an attempt to reduce the housing requirement without having due regard to the true sustainability of the settlement.

The smaller 'intermediate' rural settlements identified, namely: Hursley, Otterbourne, South Wonston, Sutton Scotney, Swanmore and Waltham Chase were asked to identify new sites for 50 to 60 dwellings each. Swanmore and Waltham Chase were added to this category and each has existing site allocations with remaining capacity for about 100 additional dwellings. No new allocations are proposed in Swanmore or Waltham Chase, with Waltham Chase regarded by officers as having "significant recent completions and commitments".

We object to the fact that the 'provision' for new homes in Waltham Chase is in fact made up from existing completions (8), outstanding permissions (9), one remaining local plan allocation (80), a windfall allowance (20) and no new sites. The NPPF requires a step change, and a significant boost in the supply of new homes, and requires Councils to plan positively. The reliance on past completions, permissions, old unrealistic allocations and an overly generous windfall allowance is not positive planning, and frankly, the allocation of no new sites is woeful for a settlement that is scored by officers to be second only to Winchester itself for its level of daily services and facilities, and overall sustainability as a settlement.

Paragraph 14.188 of the Local Plan acknowledges that "Waltham Chase is a large village in an attractive rural setting, located to the south west of the South Downs National Park. It consists mainly of relatively modern development of various styles, but it is the rural setting which gives Waltham Chase its special character. The Shedfield Village Design Statement identifies the important features and character of the village in more detail."

Paragraph 14.189 states that "Following the reassessment and updating of the settlement hierarchy, Waltham Chase is now within the group of 'intermediate' settlements, where the aim was to identify new sites for 50-60 dwellings. However, given the constraints around the village, particularly the narrow settlement gap with Swanmore, and the substantial level of allocated land remaining to be developed, no new sites are allocated

	in this Plan. Even so, it is expected that there is capacity for the development of about 120 dwellings in Waltham Chase”.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policies and evidence base)</a> <a href="#">Letter (commenting on policies and evidence base - includes pictures and tables)</a> <a href="#">Supporting document 1 (Map of site - Land at Winchester Road)</a> <a href="#">Supporting document 2 (Briefing note - Winchester Settlement Gap)</a>

<b>Policy/Evidence base document</b>	Settlement Hierarchy
<b>Name of respondent (or client)</b>	Hannah Young
<b>Personal reference number</b>	BHLF-AQTS-32QC-J
<b>Full reference number</b>	BHLF-AQTS-32QC-J/5/Settlement Hierarchy
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>2. Curdridge Settlement Designation</p> <p>Curdridge is not defined within the settlement hierarchy, falling instead within the category “remaining rural area”. For clarity we consider all settlements should be identified and categorised within the Plan to ensure it is effective. Notwithstanding this, it is our firm view that the approach taken to identifying and categorising this settlement is flawed; which in turn has had knock on implications to the determination of the Plan’s spatial strategy. The Council updated its Settlement Hierarchy Review in August 2024 to accompany this Regulation 19 consultation on the Plan. This reflects comments made to the methodology at Regulation 18 stages, including those made by Persimmon who had concerns that the methodology applied was not consistent.</p> <p>However, our concerns with how Curdridge has been classified remain outstanding and it remains unclear why these considerations have not been accounted for. To confirm, the missing services and facilities are set out below: Daily Services. Convenience retail (daily needs) – there is a shop located at the petrol station. Given that the adjoining railway station and employment area are included as part of Curdridge in the facilities audit, the convenience store should also be included. Daily bus services (hourly)- as part of the North Whitely development the number 28 Fareham- Whiteley service has been extended and the frequency increased to an hourly service. Curdridge is easily accessible to stops serving this service. This route should therefore be included in the services audit. Children’s Play Area – The Reading Room Play Area has also been omitted from the audit (but is included in the Council’s Open Space Assessment (2022)). Other Services The audit also misses the library, petrol station and postal services at the settlement. Implications Amending the hierarchy to account for the missing services and facilities would increase Curdridge’s sustainability score from 14 to 23 and its sustainability ranking from smaller rural settlements, to Tier 2, Larger Rural Settlement. It is not clear why this is not being reflected and shows inconsistencies in the approach being taken by the Council. The conclusions are not justified. Accordingly, we would expect a settlement boundary to be identified for Curdridge to help guide development. Further, we would expect growth to be directed to Curdridge and the failure to fully understand its role in the settlement hierarchy has resulted in a flawed spatial strategy. As noted above, it is served by a railway station. When planning to deliver growth in any</p>

	<p>district, the spatial strategy should provide significant weight to sites available near villages with railway station to offer genuinely sustainable development. It would be more than reasonable for Curdrige to have some growth allocated in this local plan. Further, it is located within the PfSH area which has significant unmet needs.</p> <p>Sites in less sustainable locations; such as Otterbourne, Hursely and Sutton Scotney are being favoured for development due to the inaccuracies in the settlement hierarchy. Policy H4 also limits the development potential of sites within settlements with no boundaries, which conversely have the effect of preventing sustainable growth in appropriate locations. It is also noted that the Vision confirms that “The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character”. It would be expected that growth is directed so the village can continue to grow commensurately and maintain their role in the settlement hierarchy.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Supporting document 1 (commenting on policies and proposed site)</a>  <a href="#">Supporting document 2 (site deliverability statement)</a></p>

<b>Policy/Evidence base document</b>	Statement of Community Involvement
<b>Name of respondent (or client)</b>	Jill Lee
<b>Personal reference number</b>	ANON-AQTS-3B83-S
<b>Full reference number</b>	ANON-AQTS-3B83-S/4/Statement of Community Involvement
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The views of people in South Wonston are being consistently ignored. Reg 18 responses had not been assessed by officers until 3 days after Cabinet 19th August 2024 long after the draft Reg 19 plan had been finalised. The SCI says "feedback should be provided and representations should be taken account of in a way that enables persons to see the councils response". This didn't happen. The council has a duty to be in legal compliance with the consultation undertakings in the SCI and it has not been.</p> <p>It has also been apparent that committee meetings have been held in August when people have been unable to attend due to holidays. I personally submitted 3 questions to full council which was held during the bank holiday week and I was unable to attend in person being on holiday. I was promised that 1 of my questions would be read for me by the chairman but it wasn't so the plan was approved to go out for consultation without members being aware of these issues that people wanted to raise. In fact no questions were read on behalf of people unable to attend. This again shows local opinion is effectively being ignored. The written response I received to my question only dealt with the first part. I have never received a full response in spite of chasing the councillor concerned.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	Statement of Community Involvement
<b>Name of respondent (or client)</b>	Philip Lee
<b>Personal reference number</b>	ANON-AQTS-3B5P-K
<b>Full reference number</b>	ANON-AQTS-3B5P-K/3/Statement of Community Involvement
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The views of people in South Wonston are being consistently ignored. Reg 18 responses had not been assessed by officers until 3 days after Cabinet 19th August 2024 long after the draft Reg 19 plan had been finalised. The SCI says "feedback should be provided and representations should be taken account of in a way that enables persons to see the councils response". This didn't happen. The council has a duty to be in legal compliance with the consultation undertakings in the SCI and it has not been. It has also been apparent that committee meetings have been held in August when people have been unable to attend due to holidays. I submitted 3 written questions to full council which was held during the bank holiday week and I was unable to attend in person being on holiday. I was promised that 1 of my questions would be read for me by the chairman but it wasn't so the plan was approved to go out for consultation without members being aware of these issues that people wanted to raise. In fact no questions were read on behalf of people unable to attend. This again shows local opinion is effectively being ignored. The written response I received to my question only dealt with the first part. I have never received a full response in spite of chasing the councillor concerned.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	Strategic Flood Risk Assessment
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/25/Strategic Flood Risk Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Calibro, has advised Bloor regarding the flood risk and drainage evidence base and policies. Calibro have expressed that although the high level objectives of the Plan are reasonable and correlate with the existing and draft NPPF, the methodology applied by the Level 1 and 2 Strategic Flood Risk Assessment (SFRA) relating to the process for site selection is unclear and inconsistent across the relevant documents not replicated fully by the Development Strategy and Site Selection – Proposed Submission Plan document. Bloor consider that this could bring into question the soundness of the Local Plan.</p> <p>Calibro set out that the Level 1 SFRA had two parts. Part 1 (February 2024) applied to the wider Partnership for South Hampshire and identified the datasets required to apply the Sequential Test to the 10 participating LPAs, including WCC. The datasets were:</p> <ul style="list-style-type: none"> <li>• River flooding such as flood zone mapping;</li> <li>• Surface water flooding such as the Risk of Flooding from Surface Water (RoFSW)</li> <li>• Groundwater flooding such as the BGS susceptibility to groundwater flooding</li> <li>• Sewer flooding</li> <li>• Reservoir flooding</li> <li>• Flooding from the sea</li> </ul> <p>The Level 2 SFRA (July 2024) provides the evidence base to apply the Sequential Test in WCC specifically and provides analysis of preferred allocation sites. It uses available mapped flood risk data consistent with the Level 1 SFRA.</p> <p>The Level 2 SFRA categorises the sites in four groups in accordance with the risk of flooding posed to them, as follows:</p> <ul style="list-style-type: none"> <li>• Group 1: Sites in Flood Zone 1 with some dry access and low risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records).</li> <li>• Group 2: Sites in Flood Zone 1 with limited dry access. Low risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records).</li> </ul>

- Group 3: Sites in Flood Zone 1 with risk from other sources (surface water, groundwater, modelled flood extents, reservoir flooding, historical records).
- Group 4: Sites within Flood Zones 2 and 3.

The definition of the groups is unclear as there is no quantification of the terms ‘some’ or ‘limited’ dry access, neither ‘low’ risk. For example, some sites in Group 2 have mapped surface risk from ‘Very Low’ to ‘High’ based on the RoFSW mapping. This implies there is no specific definition of the term ‘low risk’, which makes the process difficult to replicate for unallocated or assessed sites.

The WCC Flood Risk Sequential Test and Exception Test Statement (‘the Statement’, July 2024), ‘Assessing Flood Risk’ section on page 12, notes the criteria used to assess the sites that had been included in the R18 LP, as follows:

- Proportion in Flood Zone 2 and 3a;
- Proportion within Flood Zone 3b;
- Hazard ratings on the site and access route during the modelled 1 in 100 year flood event, inclusive of climate change;
- Recorded Flood Outlines;
- Number of internal and external property flooding records within 500m of the site;
- Number of historic flood incident records within 500m of the site;
- Susceptibility of the site and local to groundwater flooding based on BGS Susceptibility to Groundwater Flooding mapping and historic records

The criteria used in the Statement is therefore inconsistent with the methodology applied by the Level 1 and 2 SFRA, despite the ‘Flood Zone Definition’ section of the Statement (also on page 12) repeating the SFRA methodology. Crucially, the R18 assessment did not include analysis of surface water flood risk, which is inconsistent with the existing and draft NPPF which requires plans to take a “risk-based approach to the location of development – taking into account all sources of flood risk..”. In addition, paragraph 1.12 of the Statement explains that Flood Zone mapping “provides more precise data compared to surface water flooding”. This is often the case where detailed river modelling exists and it is generally acknowledged that the national surface water modelling is strategic scale. However, it is not always the case that flood zones are more accurately derived. For example, where the National Generalised Mapping or similar methodology has been used to derive flood zones. Nonetheless if WCC consider surface water flooding to be predicted by an inaccurate data source then it brings into question why it was a key dataset in the Level 2 SFRA.

It is noted that the site selection methodology used in the Development Strategy and Site Selection – Proposed Submission Plan (July 2024) document is also inconsistent with the SFRA and the Statement methodology. It applies just two criteria to the site appraisal – Flood Zones and Surface water flood risk areas. There is no definition or scale to quantify these areas/zones and therefore how the Integrated Impact Assessment categories are determined, e.g. Minor vs Significant. Furthermore, the use of surface water mapping to inform the site selection process is inconsistent with the R18 assessment.

	<p>Finally, Calibro were unable to find the full results of the site selections process and therefore the outcome of the Sequential Test, crucially whether some sites were not progressed on account of failing the Sequential Test. This lack of clarity, together with the inconsistent approach applied across the documents brings into question the soundness of the Local Plan.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a>  <a href="#">Supporting document 1 (South Winchester Vision Document)</a>  <a href="#">Supporting document 2 (Response to the delivery of housing)</a>  <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a>  <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>  <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

<b>Policy/Evidence base document</b>	Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/9/Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) Strategic Housing and Employment Land Availability Assessment (SHELAA) 2021/ 2023</p> <p>In responding to the Council’s Reg 18 consultation, we raised several inconsistencies between how sites were assessed through the 2021 SHELAA and these inconsistencies remain unaddressed in the 2023 SHELAA. Indeed, in relation to OT01 (OT03 in the SHELAA) and Omission Site Land off Cranbourne Drive (OT08 in the SHELAA) the same assessment summaries have been carried forward, which raises questions as to whether the consultation responses were fully reviewed and taken into consideration. As set out above we have had no feedback from the Council on these points.</p> <p>Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne pg. 26</p> <p>According to the SHLEAA methodology, the following factors were considered to assess each site’s suitability for development (which remains unchanged between 2021 to 2023):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination.</li> <li><input type="checkbox"/> potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.</li> <li><input type="checkbox"/> appropriateness and likely market attractiveness for the type of development proposed.</li> <li><input type="checkbox"/> contribution to regeneration priority areas.</li> <li><input type="checkbox"/> environmental/amenity impacts experienced by would be occupiers and neighbouring areas.</li> </ul> <p>3.18 In assessing site suitability, the Council adopted the RAG system “Red/ Amber/ Green” as part of the high-level initial assessment. Whilst this is a well adopted practice in SHELAA methodologies, in reviewing the results it is at times unclear how the assessment resulted in the concluded colour score, partly as the approach lacks transparency, but also there</p>

appears to be issues of inconsistency across the assessment, particularly apparent when reviewing constraints such as landscape, archaeology and heritage.

For instance, in considering the results of the initial landscape appraisal it is unclear how a site such as Land off Cranbourne Drive, which is both physically and visually contained could be recorded as “amber” under the SHELAA appraisal and a site such as Land east of Main Road (the current allocation) where there has already been two planning applications refused on landscape grounds could be recorded “green”. Land east of Main Road, would arguably have significantly higher impact in landscape terms than Land off Cranbourne Drive, particularly given the potential impact on views (adverse effects on receptors of higher sensitivity) available from people walking the public right of way crossing through the site and as evidenced in previous applications on this site which have been refused for reasons including landscape impact. This should have been flagged at this point as a potential significant constraint. In comparison, Land off Cranbourne Drive is considered to have limited potential impact on landscape given its contained nature and therefore should have been awarded “green”.

As noted above we highlighted this point through the Reg 18 consultation but have received no further response in terms of why this approach was progressed or considered robust. In terms of a potential heritage impact, Land east of Main Road is currently recorded as “green” despite the number of listed buildings in proximity, including Otterbourne House directly adjacent the site. A solely GIS desk-based assessment is not suitable to consider this

Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne pg. 27 constraint when the impact of the setting of listed buildings is so important. At the least, Land east of Main Road should have been recorded as “amber” in the SHELAA. Again, when considering Archaeology, Land east of Main Road has been recorded as “green”, despite the fact the line of a Roman Road directly bisects the site. Whilst our own assessments would suggest this unlikely to result in the undeliverability of the site, it would appear unjustifiable at this point to consider there to be no potential archaeology constraints. This should be recorded as “amber” in the SHELAA.

In solely reviewing the two sites OT03 and OT08 we have previously raised (and continue to raise) notable concerns on the validity of this assessment process and the robustness of the supporting SHELAA which has underpinned the initial assessment of sites and does not appear to have been reviewed despite the concerns raised.

**What modification(s) are necessary to make the**

<p><b>policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a>  <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a>  <a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a>  <a href="#">Supporting document 3 (Preliminary Flood Risk and Drainage Review)</a>  <a href="#">Supporting document 4 (Heritage Appraisal)</a>  <a href="#">Supporting document 5 (Map - Compliant Site Access)</a>  <a href="#">Supporting document 6 (Local Plan Site Promotion - Transport)</a></p>



<b>Policy/Evidence base document</b>	Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/14/Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Housing Land and Employment Land Availability Assessment (SHELAA) July 2023 The land is identified within the Strategic Housing and Employment Land Availability Assessment (SHELAA), July 2023, under various different parcel assessments : LH08; LH09; LH10; LH14 and LH15. Although parcels LH08, LH09 and LH14 are separate field parcels, they are adjacent to each other. Parcel LH10 and LH15 are to the immediate south-west and separated by from LH09 by an existing detached property and garden. Combined the parcels are located adjacent to the settlement policy boundary of Winchester as identified in the adopted Plan and the Regulation 19 Local Plan. The residential suburb of Harestock is located to the south-east, with properties fronting on to Harestock Road opposite extending the length of the site and beyond. There are also detached dwellings on the north-west side of Harestock Road, including adjacent to parcel LH10, and as outlined above, separating parcel LH10 from LH09. There are two commercial storage barns, hardstanding and parking area within parcel LH14, and storage containers in Parcel LH10. The SHELAA confirms that all of the parcels are available and deliverable and are not subject to any over arching constraints. There are some limited constraints identified as 'Amber', although some notable variations between them notwithstanding they are adjacent to one another. 3 All the parcels have Amber constraints relating to the location within the countryside and Settlement Gap, as identified in the adopted Local Plan. However, Parcel LH08 and LH15 are the only parcels that are identified as having a landscape constraint, defined in the SHELAA as likely to be 'landscape sensitive', and Parcel LH14 is the only parcel not to be identified as having an amber 'accessibility constraints', defined as either having no access to a main highway, or being greater than 800m from a bus stop, local shops and facilities, and local primary schools. The SHELAA also includes reference to the previous planning history of the parcels. In particular, an outline application (16/01188/OUT) for the development of all of the parcels, with the exception of the south-western part of LH08 and all of LH15, for up to 45 dwellings (including 40% affordable housing and at least 8 self-build units), public access, open space and barn for conversion for community. The application included a dedicated area of open space on the entirety of Parcel LH08 included within the application, and residential areas on Parcels LH09 and LH10, and mixed residential and community uses on LH14. Notwithstanding the supporting information submitted, which included a Landscape and Visual Impact Assessment, the application was refused primarily on the detrimental impact on the landscape and settlement gap. The above constraints are assessed as part of</p>

	these representations and are considered can be suitably addressed as part of consideration of the allocation of the site for residential and open space use, which is considered appropriate and necessary as set out below, and therefore are not regarded as insurmountable.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>

<b>Policy/Evidence base document</b>	Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Name of respondent (or client)</b>	Jonathan Marmont
<b>Personal reference number</b>	ANON-AQTS-32ZM-5
<b>Full reference number</b>	ANON-AQTS-32ZM-5/7/Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>CU14 &amp; CU34 High Level Transport Review.</p> <p>I strongly object to any development of CU14 and that part of CU34 not included in CU45. However, for the remaining part of CU45, I agree that access to this site should be from the North Whiteley development. The suggestion that there is an opportunity to increase the links south from the site into the existing residential development should however, be strongly refuted. The northern part of Dumas Drive to the south of the site was created as a shared surface road between vehicles and pedestrians (see 20. Access and Movement Plan – Fareham Borough Council Planning Reference P/07/1520/FP). As such, any additional road traffic would put pedestrians at an unacceptable risk. We strongly object to any development of this site, however if it were to go ahead, a more preferable option would be a pedestrian connection only to the public right of way to the east of the site. This would enable increased foot/bicycle travel.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b>	No

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Name of respondent (or client)</b>	Macra Ltd
<b>Personal reference number</b>	BHLF-AQTS-328W-D
<b>Full reference number</b>	BHLF-AQTS-328W-D/8/Strategic Housing and Economic Land Availability Assessment (SHELAA)
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Housing and Economic Land Availability Assessment (SHELAA)</p> <p>The Council prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA) (2021). This document was originally intended to underpin the PSLP in line with the intention to submit for examination in 2021. This is the only SHELAA document included within the Evidence Base to the Local Plan, however the Council has since updated the SHELAA to a base date of July 2023. The Council should include the 2023 SHELAA within its package of submission documents.</p> <p>The Council have derived their chosen strategic site allocations from the 'Suitable and Available Residential Sites'.</p> <p>Within the context of the overarching HELAA, the Council considers that there is a total 'Residential Land Availability to 2039' of 62,359 homes. It is noted that the Council have not updated the base year discussed within the SHELAA, which should be appropriately updated. It is not anticipated that this will change materially the availability of sites, however. The Council, through the various assessment stages of the SHELAA have considered the various land parcels and sites and worked through a process of exclusions to reach this overarching figure. Included within this supply, are both smaller and larger sites. The Council has only selected a small subset of these sites, deemed to be available, for allocation. The SHELAA itself, whilst setting out a high level list of the sites and providing a list of sustainability criteria in accordance with the Council's Integrated Impact Assessment (IIA), does not reach any clear conclusions on which sites are most suitable and should be taken forwards for allocation. The Council's formal assessment of the sites is set out within the IIA at Appendix F.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (listing policies and submitted document)</a> <a href="#">Letter (commenting on Policies and Evidence base)</a> <a href="#">Supporting documents (Landscape Appraisal and Maps)</a>

<b>Policy/Evidence base document</b>	Strategic Housing Market Assessment
<b>Name of respondent (or client)</b>	Macra Ltd
<b>Personal reference number</b>	BHLF-AQTS-328W-D
<b>Full reference number</b>	BHLF-AQTS-328W-D/9/Strategic Housing Market Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Winchester City Council Housing Needs Assessment (HNA)  With respect to Winchester City Council's approach to carrying out a Local Housing Needs Assessment, the Council has decided to follow the Standard Method for calculating housing need.  The Council has not taken the decision therefore to seek to demonstrate 'exceptional circumstances' exist which justify the use of an alternative approach to calculating need, but rather to meet its housing need in full. It is in this context that the proposed housing numbers as set out within the plan should be considered and assessed.</p> <p>Winchester City Council instructed the services of ICENI Projects Limited to prepare both an assessment of its Local Housing Need (LHN), and alongside this a Strategic Housing Market Assessment (SHMA) which considers the needs of particular groups of the population demographic and how this accords with the projections which form the baseline to the Standard Method for calculating housing need as defined by National Policy. The Council's Housing Needs Assessment (HNA) is therefore set out within the following documents, which are listed under the Council's Examination Documents under the title 'Housing':</p> <ul style="list-style-type: none"> <li>• Future Local Housing Need and Population Profile Assessment (January 2020) (LHN)</li> <li>• Strategic Housing Market Assessment – Winchester District (February 2020) (SHMA 2020)</li> <li>• Winchester Strategic Housing Market Assessment Update – Final Report (July 2024) (SHMA 2024)</li> </ul> <p>On the basis of the baseline position set out within the LHN assessment, the Council considers its housing need to be calculated from the following baseline figures set out within Table 3.4; as cited below, and with reference to the affordability ratio from the March 2019 release of the Ratio of House Price to Workplace Based Earnings dataset by the Office for National Statistics (ONS); comprising a mean affordability ratio of 12.25. The assessment of housing need was originally calculated by the Council on the basis of a base year of 2019, and thus for the period 2019-2029. This was subsequently updated within the LHN assessment to a base year of 2021, to cover the period from 2021-2031.</p>

Table 3.4. Projected Household Growth in Winchester District 2021-2031 – Future Local Housing Need and Population Profile Assessment (2020) Taking these figures and applying these to the standard method provides a housing need of 664 dwellings per annum as reflected within Table 3.5.

Table 3.5. Local Housing Need for Winchester District 2021-2031 – Future Local Housing Need and Population Profile Assessment (2020) Winchester City Council considered this to compromise its ‘fixed’ housing need figure, having regard for its original intention to submit the PSLP for examination in 2021. This did not however occur. It is clear therefore that there is a need to re-base the housing need based on an up to date assessment with 2024 as the base date, and thus to consider the period from 2024-2034. On this basis, the following figures apply:

Winchester District Households, 2024 52,401

Households, 2034

56,696 Household Growth, 2024-2034 4295

Annual Average Household Growth

430 (429.5)

Taking the above baseline information, the following table provides a calculation of the up to date housing needs for Winchester City Council taking 2024 as the base year, which produces a housing need of 676 homes.

Winchester District

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Annual Average Household Growth 430

Median Workplace-based Affordability Ratio (2023)

13.19 Adjustment Factor 57.4%

Local Housing Need, per annum

676 (676.2)

The Council did not, at the time of updating its local housing need assessment in 2021, update the affordability ratio, which rose from the original 2018 figure used, from 12.25, to 13.84 for the 2021 base year. At the current time, this affordability ratio as defined by the Ratio of House Price to Workplace Based Earnings dataset produced by the Office for National Statistics (ONS) stands at 13.19 for the 2023 base year, comprising the most up to date evidence.

The PSLP correctly cites at Paragraph 9.4 that the current Standard Method housing need for Winchester District stands at 676 dwellings per annum. The Council has used this as the baseline for its proposed housing delivery and thus we consider this an appropriate position. Having regard for the proposed plan period 2020-2040, the Council has allowed for the housing needs within the initial four years of the plan period, using calculations from those respective base years to determine the housing need. In total, the



housing needs of Winchester Council comprise 13,565 homes; as reflected within Table H1 of the PSLP, provided in excerpt below:

Table H1. Standard Method Annual Need – Winchester PSLP (2024)

Whilst the PSLP reflects the up to date housing need figure, the Council's background assessment, which underpins the approach taken to the standard method should however be updated accordingly. At present this document is out of date and contributes little to the Evidence Base.

It should however be noted that, should the examination of the PSLP be protracted, consideration should be given to the extension of the plan period to 2020-2041, to ensure that the PSLP appropriately plans for a minimum of a 15 year plan period as National Policy requires.

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(3)

Implications of the Emerging National Planning Policy Framework

At the time of writing, the Draft National Planning Policy Framework (DNPPF) is undergoing public consultation, with the Government committed to a comprehensive review of the feedback provided by professionals, stakeholders and the general public.

The Ministry of Housing Communities and Local Government (MHCLG) made a series of announcements and released documentation , alongside the DNPPF on 30th July 2024.

MHCLG have committed to updating the National Planning Policy Framework (NPPF) to bring back mandatory housing targets and to increase the expectation of how many homes will be built through new increased housing targets. The new housing targets are proposed to make sure that Local Authorities plan for a level of housing growth that is proportionate to the size of existing communities, but targeting specifically those areas where house prices are most out of step with local incomes through an uplift.

The Government are reinforcing the expectation for all Local Authorities to have an up to date Local Plan to properly plan for local housing needs. There is a commitment from the Government to 'step in' to push progress with Local Plans and to take 'tough decisions' where they need to be taken, however we do not at this stage have the detail of how this will work in practice and what the threshold will be for the Government to step in. The Standard Method is proposed to be substantially revised, with the current methodology considered unfit for purpose and unable to properly plan for the level of housing growth which is required across the country. The use of the Standard Method to determine housing targets will also be made mandatory, requiring local authorities to plan for their need. A lower figure can only be planned for where they can demonstrate hard constraints and that all options have been exhausted. There will be no opportunity to argue for exceptional circumstances.

The Duty to Cooperate is also to be reinforced; requiring that neighbouring authorities actually share needs and meet the housing needs of others if they cannot be met in their plan area. They will need to evidence again that all possible steps have been taken and exhausted to meet this need.

With respect to Winchester City Council the implications of the new Standard Method for calculating housing need are set out in the below table:

Local Authority	Adopted Local Plan Figure	Current Standard Method Figure	Proposed Standard Method Figure	Percentage Increase (from Current SM)
Winchester CC	625	676	1,099	63%

The Council are therefore anticipated to see a significant uplift on the housing needs for the district of approximately 63%; or a total increase of 423 homes per annum.

This comprises a clear step change in the level of housing delivery required within the plan area and one which will require a material change in the proposed spatial strategy to deliver upon. At the time of writing the Government has put in place transitional arrangements to encourage Local Planning Authorities to continue work with existing Local Plans, where they are at a sufficiently advanced stage of preparation.

The transitional period proposed by the Government's includes an extension therefore of the current local plan making system until December 2026; with any plan prepared under the current system to have been submitted for examination no later than December 2026.

For Authorities that have reached Regulation 19 Consultation/Publication Stage, but their plan has yet to be submitted for examination at the point of 'one month following the release of the new DNPPF', the Local Plan can proceed to examination as long as the gap in the number of dwellings planned for by the Local Plan is not more than 200 dwellings per annum less than would need to be planned for under the new Standard Method calculation. For plans which have not reached submission therefore, but which have planned for more than 200 homes per annum less than the new Standard Method proposes, these authorities will need to revise their plan in accordance with the new DNPPF. The new Government have now written to PINS to push for Inspectors to make 'tough decisions' and focus their time on plans that are capable of being found sound to realise the Government's aim of 'universal plan coverage'.

Inspectors are being asked therefore to only be pragmatic where a plan is capable of being found sound with limited additional work. Any pauses in the examination should be no longer than six months overall and if there are fundamental issues with the soundness of the plan, these should be withdrawn or found unsound and put back to the Local Authority. This approach applies with immediate effect to all plans within the system and upcoming examinations. Inspectors are instructed to act in good faith in respect of existing agreed pauses, unless insufficient progress is being made.

There is therefore a strong push for Local Authorities to get Local Plans in place and to meet the new housing requirements proposed by the new Standard Method, which means for almost all Local Authorities, the need to identify and release significant additional areas of land for housing growth and to plan for increased densities within their urban areas and in particular maximise the potential of Brownfield Sites, alongside release of appropriate Green Belt land with a focus on the Government's new Grey Belt classification.

	<p>We consider it is appropriate at this time for Winchester Council to be seeking to proceed with seeking the examination of its local plan. If, however, the plan remains to be submitted at the point of expiry of one month following the release of the DNNPF, the Council will be required to review its housing supply figures and identify additional sites. This is clearly a careful balance in terms of timings, but the onus is that of the Local Authority to ensure that any Local Plan submitted for examination is appropriately in compliance with National Policy.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (listing policies and submitted document)</a>  <a href="#">Letter (commenting on Policies and Evidence base)</a>  <a href="#">Supporting documents (Landscape Appraisal and Maps)</a></p>

<b>Policy/Evidence base document</b>	Strategic Transport Assessment
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/56/Strategic Transport Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Out of date and incorrect information to base spatial strategy on.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	Strategic Transport Assessment
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/23/Strategic Transport Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>WCC sets out that mitigating and adapting to climate change and reducing the carbon footprint of the district is an important part of the new Local Plan. To achieve this, it is recognised that “there needs to be a step change away from continued reliance on private cars as a main travel solution and the use of sustainable and active means of travel must be prioritised and made more attractive options” (paragraph 6.1). This is due to the fact that transport is one of the highest contributors towards the carbon footprint of the district and the private car is the least sustainable form of transport. As such, WCC recognises that it is essential for it to prioritise development towards sustainable modes of travel which includes safe and accessible means of transport with an overall low impact on the environment, which includes walking, cycling, ultra-low and zero carbon emission vehicles, car sharing and public transport (paragraph 6.2).</p> <p>Bloor supports the location of development in the most sustainable locations with the greatest opportunities for active and low carbon travel and delivery of 20-minute neighbourhoods. Noting this, Bloor do not consider that the spatial strategy and subsequent allocations in the R19 LP as drafted meet this ambition, bringing question to the plan’s soundness. Comments regarding the spatial strategy are set out in Section 4. Manor Parks offers an optimal opportunity for WCC to deliver a site with these credentials as per the information provided at Section 5 to ensure that the R19 LP can be deemed sound.</p> <p>Calibro have advised Bloor, that the R19 LP’s evidence relies on a modelling approach fixed on a 'predict and provide' approach to highway capacity modelling. This is outdated and inconsistent with the Authority's stated commitment to a 'vision-led' approach for future transport schemes. While the Authority suggests such modelling will be used to identify areas where adverse impacts arise and be used to inform non-car mitigation measures, this approach presents several flaws:</p> <p>A. Neglect of Beneficial Impacts: The approach fails to account for the positive secondary effects of a 'vision-led' approach. For instance, improved public transport and active travel connections can encourage</p>

	<p>modal shift amongst existing communities located along the route, generating wider benefits and modal shift beyond the immediate development site. These compound effects, which are likely to vary significantly by location, are not considered. This omission undermines a comprehensive assessment of each site's contribution to Plan objectives, particularly regarding reducing the need to travel and minimising carbon emissions. It potentially leads to a flawed growth strategy and site selection process, jeopardising the Plan's soundness. See Appendix 3 for further detail.</p> <p>B. Missed Strategic Opportunities: The modelling approach overlooks the potential for individual sites to make greater contributions when strategically planned in conjunction with other developments (i.e. the spatial strategy). For example, a coordinated 'vision-led' strategy for Manor Parks and Sir John Moore Barracks could facilitate integrated public transport solutions. This would not only strengthen connections to the town centre and railway station but also accelerate the delivery of the Winchester Movement Strategy, which aims to reduce the number of car trips travelling to the town centre. Failing to capitalise on such synergistic opportunities undermines the achievement of key Plan objectives and legal obligations to deliver net zero. See Appendix 3 for further detail.</p> <p>The flawed and incomplete assessment process undermines the Plan's sustainability claims and casts doubt on its alignment with its own emerging policies and Plan objectives, but also of national policy and net-zero objectives. These issues go to the heart of soundness and significant further evidence is required – and potential refinement of the strategy – are needed to resolve the weakness.</p> <p>Notwithstanding, the above concerns regarding the transport evidence base, Bloor express that the highway modelling evidence identifies increased park &amp; ride demand occurring in the southern part of Winchester Town which is of the same order of magnitude as anticipated in the northern part of the town. However, whilst the patronage changes in the northern part of the town will be accommodated (and indeed created) by a proposed new park &amp; ride facility to be delivered as part of the Sir John Moore Barracks allocation, no new infrastructure has been identified to accommodate the change in demand in the southern part of the town. This is considered to be inappropriate, as highway modelling evidence identifies increased park &amp; ride demand occurring in the southern part of Winchester Town which is of the same order of magnitude as anticipated in the northern part of the town. However, whilst the patronage changes in the northern part of the town will be accommodated (and indeed created) by a proposed new park &amp; ride facility to be delivered as part of the Sir John Moore Barracks allocation, no new infrastructure has been identified to accommodate the change in demand in the southern part of the town. Further justification for this need is set out in Appendix 3.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a>  <a href="#">Supporting document 1 (South Winchester Vision Document)</a>  <a href="#">Supporting document 2 (Response to the delivery of housing)</a>  <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a>  <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>  <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

<b>Policy/Evidence base document</b>	Strategic Transport Assessment
<b>Name of respondent (or client)</b>	Stuart Jones
<b>Personal reference number</b>	ANON-AQTS-32Z3-B
<b>Full reference number</b>	ANON-AQTS-32Z3-B/1/Strategic Transport Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Summary:</p> <p>The Strategic Transport Assessment (STA) document fails to provide a sound evidence base for the proposed Local Plan. It fails to assess the impact of public transport reductions in the Winchester Southern Parishes (WSP) area of Winchester District in the current plan period, during which there has been significant development in the area. The document then fails to propose any mitigating transport measures for further development in this area in the proposed Local Plan.</p> <p>The STA therefore fails to conform with the requirements of NPPF paras 2/11, 9/108 and 9/110 and also WCC policies SP2 and T1. Without a sound evidence base and appropriate assessment of the impacts in the WSP area of Winchester District, with appropriate mitigating sustainable transport measures for this area, the proposed Plan is unsound and undeliverable.</p> <p>The STA should be updated and appropriate mitigating measures defined, to improve access to sustainable public transport provision in the WSP area, aligned with the development plans. Although Winchester CC is not the LTA, this does not absolve WCC from performing an appropriate rigorous STA *at this stage*, so that subsequent development activities and transport providers can be guided by this assessment.</p> <p>Background and detail:</p> <ul style="list-style-type: none"> <li>- The current Winchester Local Plan included a Theme C (Role of Public Transport) with 5 policy objectives (numbers 4-8). These included 'grow bus travel', 'reduce dependence on the private car' and 'Improve co-ordination and integration between transport modes through better local interchanges, for example at rail stations.'</li> </ul> <p>(Source Winchester District Transport Statement 2013)</p> <ul style="list-style-type: none"> <li>- However, there has been a massive loss of local public transport services in our district. In 2017, there were 53 departures from Bishops Waltham Square on a weekday. In 2024, there are 35 departures. So in the south east of Winchester District, we have lost direct links to Southampton, Eastleigh and buses still connect poorly at Botley Station for train connections.</li> </ul>



	<ul style="list-style-type: none"> <li>- This significant loss of services is during a period of significant development in the WSP area, particularly in the Bishop's Waltham area, under the MTRA policy of the current plan.</li> <li>- In Whiteley, new bus services to support very large-scale development, funded by S106 money have been withdrawn in less than 2 years, cutting the link to Botley Station.</li> <li>- The current Local Plan has therefore proved itself to be undeliverable to meet sustainable objectives.</li> <li>- The proposed Local Plan does not assess the issue of this reduced baseline, nor does it propose any mitigating measures to 'align infrastructure and growth' or so that 'investments for supporting sustainable transport and development patterns are aligned' as required by the NPPF</li> <li>- Section 5 of the STA 'Planned improvements in sustainable transport' contains the proposed mitigating measures. However, the core list of issues and bus-related schemes in 5.7 and 5.8 relate *only* to Winchester City itself. There is *no* mention of District areas that are also expected to take further development, such as the Winchester Southern Parishes, inc. Bishop' Waltham.</li> <li>- Cycling improvements proposed in the Winchester LCWIP persist the NW-SE grain of infrastructure, focussed on a Winchester-Fareham axis across the WSP area. There is no recognition in the STA of the fact that the area is part of the Southampton Travel To Work Area, as defined by ONS and supported by national census data.</li> <li>- These issues have been constructively highlighted to WCC Cabinet and Council in August 2024. A WCC response proposed that the travel assessment would be worked through in subsequent development stages. However, the STA is so poor in its current state that it would offer WCC no basis on which to negotiate for mitigating measures in subsequent development stages and would not currently 'provide a basis for creditable conversations with transport providers'.</li> <li>- To meet NPPF requirements, the STA should be updated to include required mitigations for the WSP area, especially Bishop's Waltham. These could be in the form of an initial 'wishlist' or topics to frame further investigation and analysis at the next stage. But these cannot be omitted from the STA at this stage.</li> <li>- Although WCC are not the transport provider, this does not absolve them of the requirement to lead the assessment of the measures which are required to align with the proposed development.</li> </ul> <p>Stuart Jones  (I am a member of the Hampshire Bus Service Improvement Enhanced Partnership Forum, but my comments are as an individual)  NB. My statement to WCC Cabinet on 19th August and my question to Winchester Council meeting on 28th August have been sent to Toby Ayling, Principal Planning Officer. Please attach these to my comments via the Local Plan consultation portal, to be considered as my overall comments on the STA</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Statement to WCC Cabinet meeting)</a> <a href="#">Supporting document 2 (Request to speak at Cabinet meeting)</a>

<b>Policy/Evidence base document</b>	Strategic Transport Assessment
<b>Name of respondent (or client)</b>	Mrs Anne Collins
<b>Personal reference number</b>	BHLF-AQTS-328Z-G - Durley Parish Council
<b>Full reference number</b>	BHLF-AQTS-328Z-G - Durley Parish Council/1/Strategic Transport Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Legally compliant - yes  Sound - no  Complies with the duty to co-operate - yes</p> <p>Durley Parish Council have serious concerns regarding the potential changes that are included in Regulation 19, and based on the Strategic Transport Assessment. The following report is a summary of the current situation in Durley, but rather than just highlighting the failings it attempts to look at potential solutions. It is our belief that the subject of Public Transport within the Winchester District is so significant that it deserves a collaborative focus that includes all relevant bodies, not just the bus companies, District and County Councils but also includes Parish Councils and other relevant community organisations. This should take the form of an open and constructive workshop that explores all potential options. As the report below shows, there can be options for certain areas that could expand services without any additional costs.  Bus Services in Durley.</p> <p>At the time of writing this there is a single bus service that operates through Durley, operated by Stagecoach route 49, which provides a very limited service from Monday to Friday. . See appendix A for the relevant section of the timetable for this service. Whilst this does provide a public transport service to the residents of Durley it, in reality, only enables any sort of “round trip” to two a day. See appendix B for the details of these two round trips. There is no service at weekends nor on Bank Holidays.</p> <p>Although relevant to Durley, this paper does not include the Bluestar 606 service to Barton Peveril College as this is a college service that only operates during term times. For a small village such as Durley, where the public usage of the current bus service is very low and there is very limited new development, it is difficult to argue for enhanced bus services. However, you have to look at how the continued decline of services provided through Durley only lead to a complete loss of faith in any service with the obvious result that residents use, and have to use, private transport although in many cases that is not an option.</p>

	<p>Both Winchester City Council and Hampshire County Council have a clearly stated aim of reducing the usage and dependency on private vehicles, and this can only be enabled by better public transport. Yet all the published improvement plans for bus services only focus on a very limited number of routes and only show further reductions for villages such as Durley.</p> <p>As far as Durley is concerned, and it is the focus of this paper, there would seem to be a few possible solutions to providing a regular service through the village. Durley sits between two existing bus routes, the Bluestar 3 service Southampton to Eastleigh via Botley to the west of Durley, and the Stagecoach 69 service runs, as part of its route, from Bishops Waltham to Fair Oak via Upham to the east. If alternate services of either, or both, were to operate via Durley a regular service with a variety of connections would be available to the residents of Durley. This would, obviously, reduce the services through part of their existing routes but would not be removing the service. A third option could be to look at the Bluestar route 2 service which currently terminates at Fair Oak. It would be a relatively simple extension to this route if some, or all, of the schedule services extended their route in a loop, taking in Mortimers Lane, Winchester Road, through Durley and then back to Fair Oak. If one of these options was coupled with an overall increase in the frequency of the route the negative impact on the sections or timetable affected by this alternating service would be minimized.</p> <p>Of course, a fundamental part of any public transport service is its usage by the public and to justify what is proposed in this paper would require a demonstrable demand. However, as mentioned at the beginning, the continued decline of services through Durley in the recent past has resulted in a complete loss of faith in public transport. It will, therefore, require a high level of commitment to the service together with a significant amount of publicity and support to attract residents back to using the service.</p> <p>Re-think the routes of the bus services through the Meon Valley to make them more viable and attractive to users. Thus saving carbon usage.</p> <p>see additional information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (copy of form - response detailed in supporting document)</a> <a href="#">Supporting document (Commenting on policy and evidence base)</a>

<b>Policy/Evidence base document</b>	Strategic Transport Assessment
<b>Name of respondent (or client)</b>	Mrs Anne Collins
<b>Personal reference number</b>	BHLF-AQTS-328N-4
<b>Full reference number</b>	BHLF-AQTS-328N-4/3/Strategic Transport Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The WSPG believes that the Draft Plan contains policies designed to mitigate and arrest the effects of Climate Change effectively. The Strategic Transport Assessment (STA) commissioned as supporting evidence for the Draft Local Plan and submitted for Regulation 19 is, however, fundamentally flawed in that:</p> <ul style="list-style-type: none"> <li>• these policies will fail to deliver effectively without a more robustly supportive STA;</li> <li>• the STA fails to acknowledge the significant loss of public transport over the last Local Plan period and the impact of that loss, during a period of large-scale development in the WSPG area</li> <li>• the STA fails to identify the positive action required by the Local Transport Authority (LTA) to identify and act on the opportunities presented by WCC's proposed delivery of new housing;</li> <li>• the STA fails to identify proven, deliverable funding models to support necessary public transport infrastructure, given the failure of previous models to support large developments;</li> <li>• the STA therefore fails to identify action required to develop a viable, integrated public transport network in support of new housing, to align growth and infrastructure as required by the NPPF;</li> <li>• the STA is therefore unfit for purpose and places the soundness of the Draft Plan in question.</li> </ul> <p>The MDAs in particular present an opportunity to develop a more integrated transport system for the wider Portsmouth, Southampton and Winchester travel-to-work areas. The area benefits from a good rail network, but one that now depends on 'feeder' bus services to be an attractive alternative to car use. The experience from the previous build-out of MDAs is, however, one of opportunity lost. As these areas fall outside the scope of Hampshire's Bus Service Improvement Plan (BSIP), which focusses on improving already commercially viable services, bus provision has been limited to a minimal service delivered at the cost of Developers' Section 106 contributions, and time limited. The LTA has made no effective attempt at developing these services, to tap into the latent demand for a reliable public transport alternative, well integrated with the existing bus and train networks, as national policy seeks to promote. It is extraordinary that developments such as West of Waterlooville and North Whiteley have been populated without consideration of any meaningful supporting public transport infrastructure. In the case of 'greater' Whiteley, a settlement of 10 000 homes has been allowed to develop without the support of an integrated public transport system.</p>

#### Statement of Common Ground

Winchester City Council (WCC) is reliant on Hampshire County Council as the Local Transport Authority for its strategic planning of public transport. WCC's methodology in identifying allocation areas to ensure a supply of new housing, commercial and employment use development is sound, as is its focus on measures to achieve carbon neutrality, mitigate the effects of climate change and, as far as is practicable, arrest its progress. It is also agreed that the LPA's ability to implement the modal shifts to more sustainable transport is largely limited to its laudable efforts to ensure that significant new developments are designed to encourage permeability and active transport. It is the role of HCC as the Local Transport Authority (LTA), not WCC, to engage with transport operators and facilitate the development of an integrated transport network to achieve these aims. However, this does not absolve WCC from the requirements of the NPPF, which requires WCC to produce a robust assessment of the current and future transport provision.

Public Transport Provision in the Southern Parishes Of the three spatial areas identified in the draft plan, Winchester City and the South Hampshire Urban Areas are well served by rail services, both radial from London and the local inter – and intra-urban networks. The City and the neighbouring employment centres of Portsmouth and Southampton both have effective, widely-penetrating and predominantly commercially-run bus networks. As the Solent conurbation developed through the 20th Century, new housing largely developed linearly along these already established public transport corridors.

From the turn of the century, major development areas have had to be identified beyond these corridors to deliver the required supply of housing, together with expansion of markets towns, which traditionally acted as service centres to a relatively small catchment, as commuter dormitories. By contrast to earlier development, the area north of the M27 was never well served by frequent public transport. Given that the bus routes in this area were largely developed a century ago to serve a far more limited requirement, there is no firm, commercial foundation on which to build a modern integrated network. HCC's own Local Transport Plan 4, issued in February 2024, also noted the following:

“We need to cater for an ageing population. Ensuring safe access to amenities is vital for keeping older people physically and socially active. A lack of choice of quality public transport provision is contributing to loneliness, social exclusion and deprivation, especially in rural areas.”

Bishops Waltham, the main market town in the Southern Parishes, has seen significant development in the current local plan period. Over the same period the bus offer in the town has significantly reduced.

Historically, the town was served by hourly buses to Southampton, Winchester and Fareham, with a two-hourly service to Petersfield. In recent years this network has shrunk to a core hourly service on Stagecoach service 69 from Fareham to Winchester. In 2017, there were 53 weekday departures from Bishops Waltham Square. In 2024, there are 35 departures. The journey time to Winchester, at 53 minutes, does not make this a viable commuting or shopping link. It takes a circuitous route to serve other communities that have also seen service reductions; but in providing this notional service to a range of off-route communities the attraction of the basic service is greatly diminished. The link to Southampton and Petersfield has been

completely lost, together with any pretence at integrating bus and train networks. Winchester Southern Parishes are included in the Southampton Travel to Work Area as defined by the ONS, but the STA does not assess the travel requirements associated with this. Botley station is now only served by a sporadic school-driven service and bus timings are not optimised to connect with trains.

Failure to Deliver Sustainable Public Transport Provision via S106 Agreements Newlands, part of the MDA west of Waterlooville, was originally served by diversion of a service from Hambledon and Denmead that continued via Waterlooville and Queen Alexandra Hospital, Cosham before going on to Portsmouth. This vanished when an S106 trigger point was reached to be replaced by the D1 and D2 services from Denmead and Hambledon respectively, with a combined hourly daytime frequency, that go no further than Waterlooville. In Whiteley, an irregular service of 6 weekday journeys serves Swanwick station before travelling on to Fareham, with only 3 journeys on Saturdays. There is no link to Botley station (for services to Winchester and London) nor is there any effective provision to Queen Alexandra, the local district hospital. As yet there is no bus provision in North Whiteley. The Guidance and Requirements which the STA Fails to Meet For the STA to be fit for purpose it must adhere to the Ministry for Housing, Communities and Local Government guidance for such supporting documents in Local Plan development. Specifically it should:

“assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport”, and address “the locations of proposed land allocations and areas/corridors of development and potential options for the provision of sustainable transport and transport networks to serve them”, and “solutions to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport”.

The guidance is clear that one of the primary roles of an STA is to identify the opportunities presented by new development site allocations to improve the overall public transport network and encourage modal change from the private car. The authors of the document supporting the Plan have entirely failed in their responsibility in this respect, whilst WCC declines to recognise, and demand rectification of, this failure. By doing so, the fulfilment of the Plan’s policy SP2, itself supportive of the County’s and South Downs National Park’s wider climate emergency policies, is made near impossible through lack of any meaningful support from the Transport Authority.

WSPG’s collective view is that the STA should provide the opportunity to recognise these past shortcomings and, as central Government guidance requires, recognise the further opportunities presented by the Draft Local Plan allocations to identify where LTA effort and resources should be targeted to enable the modal shift from private to public transport that the climate emergency demands. The document presented in the supporting evidence of the Regulation 19 consultation falls very far short of satisfying this requirement. It takes as its starting point the severely flawed BSIP, which focuses solely on further strengthening already



	<p>commercially viable services, whilst totally ignoring the potential for expansion of the network that the MDAs present.</p> <p>Conclusion The STA submitted as supporting evidence for the Draft Local Plan Regulation 19 consultation fails to address the requirements for such assessments and therefore fails to support delivery of Policies SP2 and T1 in the draft Local Plan. It not enough for WCC to state that public transport will be considered at individual development plan stage. NPPF and WCC Plan Policy T1 clearly state that it will be considered ‘at every stage of the development’ The STA is therefore not fit for purpose and requires major revision to support the examination in public; without this, the draft Local Plan as issued for consultation, risks being judged unsound.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (Copy of form - refers to letter)</a>  <a href="#">Letter (Commenting on policy and evidence base)</a></p>

<b>Policy/Evidence base document</b>	Strategic Transport Assessment
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/35/Strategic Transport Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	The Strategic Transport Assessment (STA) provides an assessment of the highway impact of the Winchester local plan development sites on the Hampshire highways network. The County Council support the use of a “vision led” approach which focuses on providing a genuine travel choice and the use of the Sub Regional Transport Model (SRTM) to assess the traffic growth and impacts on the network serving Winchester and southeast Hampshire.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	Strategic Transport Assessment
<b>Name of respondent (or client)</b>	Patrick Blake
<b>Personal reference number</b>	BHLF-AQTS-32QF-N - National Highways
<b>Full reference number</b>	BHLF-AQTS-32QF-N - National Highways/5/Strategic Transport Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>When identifying the preferred strategy for the spatial options, consideration will need to be given to assessing the cumulative impact of new sites that might be taken forward together with already planned growth on the SRN. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably practicable. As previously stated, we will support proposals that consider sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN. We continue to liaise with the Council and their transport consultant in regard to the traffic modelling presented as part of the Plan evidence base. It is recognised that there is still some uncertainty regarding the proposed mitigation package to support the Bushfield proposals. Once the impacts are fully understood and agreed through the ongoing dialogue for the live planning application, we will be able to confirm the appropriate mitigation package to support Bushfield proposals in combination with wider local plan growth. We will continue to work with the Council to resolve our outstanding queries and provide future updates to the Infrastructure Delivery Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	Viability Assessment
<b>Name of respondent (or client)</b>	Mark Behrendt
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/11/Viability Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>11. HBF have highlighted below some concern that the impact on viability of CN3 has not been properly accounted for. In addition, we are concerned that the cost of meeting BNG has not be fully accounted for given that it appears to have been based on the 2019 Impact Assessment (IA). Whilst in the absence of other costs these have been used across the country for assessing viability. However, it must be noted that the IA is an examination of the broad costs to the development industry based on a range of assumptions that will not necessarily reflect the type and location of development coming forward in Wealden and the costs of delivering BNG. In addition, the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management costs may well be higher compared to the study and the Council will need to provide evidence to what these costs are rather than rely on those set out in the IA.</p> <p>12. Furthermore, the IA makes no consideration as to the potential reduction in the developable area in order to deliver at least 50% of net gains on site. This is the assumption made in the central estimate and which used in the Council's VA. In some cases, this may have limited impact whereas on some sites it will impact significantly on the number of homes delivered. These assumptions will need to be tested with regard to allocated sites to understand the degree to which BNG can be delivered on site whilst still delivering expected levels of development. For the typology testing we would suggest that the council should undertake sensitivity testing to consider the impacts of having deliver more BNG offsite.</p> <p>13. Finally in using the cost estimate in the IA the Council are underestimating the cost of offsite delivery to meet net gains. The IA applies a cost of £11,000 per offsite credit. This much lower than current prices in the market which are in the region of:</p> <ul style="list-style-type: none"> <li>• £30-50,000 per Grassland unit.</li> <li>• £30-50,000 per Hedgerow unit.</li> <li>• £30-50,000 per scrubland unit.</li> <li>• £30-50,000 per individual tree.</li> </ul> <p>14. These costs could also be higher still if there are insufficient credits locally. If credits are bought elsewhere then the spatial risk multiplier in the BNG Metric will increase the number of credits that are required.</p>

	15. Therefore, HBF consider it necessary for the council to update the inputs in the viability assessment to take account of the potentially higher costs relating to BNG. In addition, it will important that consideration is given to the anticipated level of BNG on allocated sites to ensure that the viability assessment is fully reflective of the likely site specific costs of delivering the required level of BNG.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (Commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	Viability Assessment
<b>Name of respondent (or client)</b>	McCarthy Stone & Churchill Living
<b>Personal reference number</b>	ANON-AQTS-3274-9
<b>Full reference number</b>	ANON-AQTS-3274-9/6/Viability Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>We also have some concerns with regard to some of the assumptions that have been used in the Viability Report and if amended and tested in line with the following recommendations, would be likely to show sheltered and extra care housing considerably less viable than is assumed in the policy. We recommend that the Viability Report is run for sheltered and extra-care housing using the assumptions recommended below and the affordable housing policy amended accordingly.</p> <p><b>Unit numbers / GIA / Density</b> We note that the Viability Report (Appendix 1) has modelled a unit density of 150 dwellings per hectare resulting in a 30-unit scheme being modelled on a 0.2 hectare site for the Sheltered typology and a unit density of 150 per hectare resulting in a 60-unit scheme being modelled on a 0.4 hectare site for the Extra-Care typology. However, a typical sheltered housing / retirement living scheme would consist of 45 dwellings on a gross site area of 0.45 hectares creating a density of 100 units per hectare. Extra care housing tends to have a lower density and a typical scheme would consist of 60 units on a 0.75 hectare site at a lower density of 80 units per hectare. Therefore, a scheme of 50 units should be modelled for sheltered housing and a scheme of 40 units should be modelled for extra care, both on a site of 0.5 hectares at a density of 100 units per hectare and 80 units per hectare respectively.</p> <p><b>Sales and marketing costs</b> As detailed within the RHG Briefing Note sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling rather than the 3% used.'</p> <p><b>Sales periods</b> As discussed in the RHG Briefing Note, sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales / occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the</p>



viability modelling and amended accordingly. These longer sales periods should therefore be incorporated into the Viability Report.

#### Empty property costs

It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost – to cover Council Tax liability on unsold units and service charges (which will be applicable to the whole building from day first resident moves in). This increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff and services and reflecting a slower sales rate than Retirement Living. We note that costs of approximately £2,000 and £5,000 per unit respectively have been applied to cover the sales period, but this is not enough to cover all costs.

#### External build costs

From our experience external build costs tend to range from 8% to 15% of base build costs on flatted schemes within urban areas and we therefore feel that an allowance is 10% of base build cost should be used for external build costs for brownfield sites rather than the 7.5% used in the Viability Report.

#### Developer Return

PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers. However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people rather than the 17.5% base position used within the Report.

#### Sales Values

We note that the Viability Study has only tested Specialist housing for older people with respect to the higher Value Levels of 8 and above, and indeed has given the typology an addition sales value of 12. This makes an assumption that specialist housing for older people has a large premium over other housing. The assumptions show in Appendix 2 (august 2024 report) that at Value Level 8 affordable housing becomes more challenging. The study should have tested specialist housing for older people at lower value levels as well which would show a much more challenging viability position.

Policy costs –BNG Since the price of statutory BNG units have been published it has enabled it to be determined how much BNG may cost and this needs to be incorporated into the viability report at a realistic level. In addition, brownfield site BNG costs are often more substantial than Greenfield, but this very much depends on the site characteristics. For example, if an older persons' housing scheme consisting of 50 units

	<p>on a 0.5 hectare site needed to purchase one off-site statutory credit, if this was for the cheapest low quality habitat type this would cost £84,000 or £1,680 per unit given that 2 credits are needed per unit. Older Persons housing schemes are ideally located on small windfall sites close to local facilities and it will most likely be that BNG requirements will need to be met largely or entirely off site by contribution.</p> <p>Policy cost – M4 (3)</p> <p>Despite the draft plan requiring 5% of older persons housing to be built for M4(3) and an additional cost figure of £115 sq. m shown in Appendix 1, Assumptions Summary of the August 2024 Local Plan Viability Report the council should note that any M4(3) requirement needs to be considered on top of M4(2), equating to an additional cost of £5,750per unit. Additional costs include fixtures and fittings, services and controls and increased room dimensions and layout which include up to 30% more floorspace and corresponding reduction in density, sales values, and affordability of such housing. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement and the cost is likely to be much greater than the £115 per sqm used in the study. Indeed, we note that Dixon Searle have used a higher figure for other Local Plan Viability studies across the country. For example, in Horsham a value of £10,307 or 5% of build cost was used.</p> <p>The inclusion of a requirement for older persons' housing to deliver affordable housing in line with policy H5 will therefore create an unrealistic over aspirational policy requirement that would no doubt result in protracted discussion at the decision-making stage. This would potentially be adversarial, requiring protracted negotiations with Council officers and their commissioned consultants, and result in difficulties with decision makers expecting policy compliancy. As a minimum, the policy should therefore be amended to make it clear that older person's housing is more challenging in viability terms with respect to affordable housing to ensure that the plan is deliverable, justified and consistent with national policy. However, ideally the viability study should be re-run using the correct assumptions.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	Viability Assessment
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/24/Viability Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>BNG</p> <p>Notwithstanding, Bloor’s overall support to deliver 10% BNG, as set out by the HBF in their representations to the WCC R19 LP, it is considered that the cost of meeting BNG has not be fully accounted for given that it appears to have been based on the 2019 Impact Assessment (IA). The IA is an examination of the broad costs to the development industry based on a range of assumptions that will not necessarily reflect the type and location of development coming forward in Wealden and the costs of delivering BNG. In addition, the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management costs may well be higher compared to the study and the Council will need to provide evidence to what these costs are rather than rely on those set out in the IA. Furthermore, the IA makes no consideration as to the potential reduction in the developable area in order to deliver at least 50% of net gains on site. This is the assumption made in the central estimate and which used in the Council’s VA. As expressed by the HBF in using the cost estimate in the IA the Council are underestimating the cost of offsite delivery to meet net gains. The IA applies a cost of £11,000 per offsite credit. This much lower than current prices in the market which are in the region of: £30-50,000 per Grassland unit; £30-50,000 per Hedgerow unit; £30-50,000 per scrubland unit and; £30-50,000 per individual tree. These costs could also be higher still if there are insufficient credits locally. If credits are bought elsewhere then the spatial risk multiplier in the BNG Metric will increase the number of credits that are required. As such, Bloor, alongside the HBF consider that it is necessary for the council to update the inputs in the viability assessment to take account of the potentially higher costs relating to BNG.</p> <p>LETI Standard</p> <p>The WCC Local Plan Viability Study states on page 15, paragraph 3.31 that there are a range of sources as to costs and the assumption made is that it will fall in the range of an additional 5.0-5.8% on base build costs over the 2021 Building Regulations Part L update. Bloor considers this may be an underestimate of the costs.</p>

	<p>The Future Homes Hub has undertaken some work to support and inform the implementation of the FHS which is set out in “Ready for Zero”. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council, however it must be noted that these are based on the use of SAP which the Council consider to underestimate the energy efficiency performance of new homes. “Ready for Zero” indicates that in order to deliver a similar standard to that being proposed by the Council would be around a 15% to 20% increase in per unit costs (c. £17,000 to £22,000 more per unit as per the HBF representation to WCC) compared to the 2021 Building Regulations Part L. Whilst the specifications and assessment methodology may not be directly comparable to those being proposed by the Council it provides an indication as to the costs and that these are likely to be higher than those proposed in the viability assessment.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a>  <a href="#">Supporting document 1 (South Winchester Vision Document)</a>  <a href="#">Supporting document 2 (Response to the delivery of housing)</a>  <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a>  <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>  <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

<b>Policy/Evidence base document</b>	Village Design Guidelines and Neighbourhood Plans
<b>Name of respondent (or client)</b>	Jamie Matthews .. Clerk
<b>Personal reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council
<b>Full reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council/5/Village Design Guidelines and Neighbourhood Plans
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	This document does not include the Twyford Neighbourhood plan which does not appear in the evidence base elsewhere . This plan is relevant to the Sec 19 review and has an extensive evidence base of its own.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	WinACC Renewable Energy in Winchester District (February 2022)
<b>Name of respondent (or client)</b>	Bill Gunyon
<b>Personal reference number</b>	ANON-AQTS-3BR7-Q
<b>Full reference number</b>	ANON-AQTS-3BR7-Q/3/WinACC Renewable Energy in Winchester District (February 2022)
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>In the period since the Regulation 18 consultation, WinACC published a further annual report: "Renewable Energy in Winchester District (May 2023)" <a href="https://www.winacc.org.uk/wp-content/uploads/2023/04/District-report-2023-DONE.pdf">https://www.winacc.org.uk/wp-content/uploads/2023/04/District-report-2023-DONE.pdf</a>.</p> <p>The report updates and improves data on local renewable generation and presents a more specific vision of the District's potential contribution to national grid decarbonisation (Appendices 2 and 3). It may be helpful to consider adding this report to the Evidence Base.</p> <p>A more scientific assessment of the potential for solar was commissioned by the City Council from Energeo in 2022. And it's possible that SSEN has shared similar technical data for solar and wind as part of the LENZA programme to assist the Council with preparation of a Local Area Energy Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	No

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	Windfall Assessment
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/11/Windfall Assessment
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) Reviewing the Windfall Allowance</p> <p>In reviewing the windfall allowance this report has focused particular attention to the proposed windfall allowances allocated to those smaller settlements including Otterbourne. The Assessment of Windfall Trends and Potential Report (2021) which remains the latest version of the document to support the Reg 19 Local Plan states that “A potential windfall</p> <p>Land off Cranbourne Drive, Otterbourne pg. 20 supply for the MTRA3a settlements as a whole has been calculated as 45 dwellings (3 dwellings per annum over 15 years)”.2.35 As set out in paragraph 5.25 of the Windfall Assessment report the settlements which fall within the category MTRA3(a) include: Compton Down, Hursley, Knowle, Littleton, Micheldever, Micheldever Station, Old Alresford, Otterbourne, South Wonston, Southdown, Southwick, Sparsholt and Sutton Scotney.</p> <p>However, in reviewing the Local Plan housing sources for Hursley (pg. 481), Otterbourne (pg. 485), South Wonston (pg. 491) and Sutton Scotney (pg. 499) this shows that these settlements have each been given a windfall allowance of 20 dwellings. This highlights the windfall allowance for these settlements does not follow the evidence set out in the Windfall Assessment. The Council looks to be placing an over reliance on the delivery of windfall development in the smaller settlements when they should be ensuring the delivery of larger allocations in these settlements to provide greater certainty that the overall housing requirement will be met, rather than the hope that the windfall trend will continue on sites that are not specifically identified now in the plan.</p> <p>The response provided in relation to the calculation of the Windfall allowance, as set out in the 2024 Housing Topic Paper, is that “whilst some respondents question the accuracy of the windfall estimates that are attributed to the main settlements the Windfall Study does not attribute windfall estimates to most individual settlements, so the figures in these tables are broad estimates. However, they are based on the expected</p>

levels of windfall in the relevant spatial areas and the windfall estimates are not critical at the settlement level, as the settlement housing requirements are for 'new sites to be allocated'. It is appropriate to make an allowance for windfall at the district level, but it is not critical whether the estimates prove to be exact for each settlement".

However, we do not feel the statement is a justified response to this concern. The Local Plan has apportioned a need for the various settlements, which is evidenced as being met through allocations, windfall development and existing commitments/ completions. If the windfall allowance for an area is too high, surely to meet that need a larger allocation would be required.

2.39 Assessing Otterbourne specifically, the Council has included a windfall allowance of 20 dwellings over the plan period to 2040. However as evidenced in the Assessment of Windfall Trends and Potential Report (2021), just 5 dwellings were delivered over the 11 year period between 2012 – 2023. Also acknowledging as of 2023, there were no outstanding commitments.

pg. 21 This again, highlights that a windfall allowance for Otterbourne of 20 dwellings is too high and will lead to under delivery. Based on the completions evidence it is considered more realistic to suggest a windfall allowance of around 9 dwellings for a settlement such as Otterbourne. The evidence base therefore suggests that the Council should look to allocate a site capable of delivering at least 64 dwellings in Otterbourne to ensure that housing need is met on suitable and sustainable sites within the village (acknowledging this is without further considerations regarding the implications of the SM update).

In conclusion Barwood Land object to policy H3 which is considered unsound as it does not appropriately apportion growth to the most sustainable locations or consider how smaller settlements can (through a polycentric approach) actually provide access to a far broader range of services and facilities than simply assessing the sustainability of a location in terms of the settlement boundaries.

The evidence utilised to support the policy (including windfall figures for the individual smaller settlements such as Otterbourne), is not appropriately apportioned and suggests this alongside the proposed allocation will not meet the proposed need under the existing SM, let alone with a more detailed understanding of the implications of the proposed SM update.

2.43 The Policy is not considered to be positively prepared (i.e. deliver an appropriate strategy to meet the area's objectively assessed needs) and continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that

	<p>smaller sustainably located towns and villages can offer.</p> <p>2.44 It is suggested that the policy should be modified to allow for an increased focus on those smaller settlements and lesser reliance on Winchester Town.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<p><b>Have you submitted supporting information?</b></p> <p><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a></p> <p><a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a></p> <p><a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a></p> <p><a href="#">Supporting document 3 (Preliminary Flood Risk and Drainage Review)</a></p> <p><a href="#">Supporting document 4 (Heritage Appraisal)</a></p> <p><a href="#">Supporting document 5 (Map - Compliant Site Access)</a></p> <p><a href="#">Supporting document 6 (Local Plan Site Promotion - Transport)</a></p>